

Message

From: Campbell, Ann [Campbell.Ann@epa.gov]
Sent: 10/19/2021 10:12:43 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]
CC: Hooper, Daniel [hooper.daniel@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]
Subject: FOR YOUR SIGNATURE: MSTRS Package -- OAR-22-000-0262
Attachments: 2021 MSTRS Invitation Letter New Members .doc; 2021 MSTRS Reappointment Letter.doc; 2021 MSTRS Reappointment Letter_RGE.doc; 2021 MSTRS Thank You Letter Departing Members.doc; MSTRS 2021 contacts3.xlsx; 2021 MSTRS Bios Resumes.zip; 2021 Action Memo.docx; RE: FOR YOUR REVIEW: MSTRS Package -- OAR-22-000-0262

Joe, the attached is ready for your review and signature on the action memo. Ale has reviewed and concurred (attached). The membership term for some is expected to begin on November 16 so we hope to move these to the AO quickly for final processing and signature, preferably prior to the Administrator's departure for the COP.

Thank you,

Ann (Campbell) Ferrio
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 566 1370

From: Hamilton, Sabrina <Hamilton.Sabrina@epa.gov>
Sent: Friday, October 15, 2021 3:52 PM
To: Campbell, Ann <Campbell.Ann@epa.gov>
Subject: FOR CONCURRENCE & SIGNATURE (ACTION MEMO) for MSTRS Package -- OAR-22-000-0262

Ann,

This package is so big that I'm only sending you the action memo for Joe's signature, the response letters and the bios on the individuals. If you or Joe wants to see more information, I can forward you Tanya's emails since she broke the package up into three parts due to the size of the files. Please have Joe sign off on the action memo. Thanks

Sabrina

Message

From: Campbell, Ann [Campbell.Ann@epa.gov]
Sent: 12/14/2021 1:36:29 AM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Hooper, Daniel [hooper.daniel@epa.gov]
CC: Kim, Eunjung [Kim.Eun@epa.gov]
Subject: RE: *URGENT ACTION* -- CONFLICTS ALERT

I am handling.

Ann (Campbell) Ferrio
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 566 1370

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Monday, December 13, 2021 7:16 PM
To: Hooper, Daniel <hooper.daniel@epa.gov>
Cc: Campbell, Ann <Campbell.Ann@epa.gov>; Kim, Eunjung <Kim.Eun@epa.gov>
Subject: *URGENT ACTION* -- CONFLICTS ALERT
Importance: High

Ex. 5 Deliberative Process (DP)

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

From: Hooper, Daniel <hooper.daniel@epa.gov>
Sent: Monday, December 13, 2021 5:42 PM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Campbell, Ann <Campbell.Ann@epa.gov>; Kim, Eunjung <Kim.Eun@epa.gov>
Subject: READING: Materials for Tuesday, December 14

Goffman, Joseph Calendar
Goffman.Joseph@epa.gov
On Tuesday, December 14, 2021
Time zone: (UTC-05:00) Eastern Time (US & Canada)
(Adjusted for Daylight Saving Time)

December 2021
Su Mo Tu We Th Fr Sa

1 2 3 4
5 6 7 8 9 10 11
12 13 **14** 15 16 17 18
19 20 21 22 23 24 25
26 27 28 29 30 31

☐ Busy
☒ Tentative
☐ Free
☐ Out of Office
☒ Working Elsewhere
☐ Outside of Working Hours

December 2021

▲ Tue, Dec 14

<input type="checkbox"/>	Before 8:00 AM	Free
<input type="checkbox"/>	8:00 AM – 9:00 AM	Free
<input type="checkbox"/>	9:00 AM – 9:30 AM	Management Roundtable
<input type="checkbox"/>	9:30 AM – 10:15 AM	OAR Senior Staff
<input type="checkbox"/>	10:15 AM – 11:00 AM	Decisional Briefing for Lead Acid Battery Manufacturing NESHAP and NSPS review proposals (Tier 3, SAN 8602 and 8603) (1 word doc)
<input type="checkbox"/>	11:00 AM – 12:00 PM	Infrastructure Preparedness Planning
<input type="checkbox"/>	12:00 PM – 12:30 PM	OTAQ Weekly
<input type="checkbox"/>	12:30 PM – 1:00 PM	Hold: OH State Representatives Meeting
<input type="checkbox"/>	1:00 PM – 1:30 PM	Weekly Check-In with Joe (1 email)
<input type="checkbox"/>	1:30 PM – 2:00 PM	Free
<input type="checkbox"/>	2:00 PM – 3:00 PM	OAR Business Review (1 email)
<input type="checkbox"/>	3:00 PM – 3:30 PM	Video-call: Weekly Infrastructure Meeting
<input type="checkbox"/>	3:30 PM – 4:00 PM	The future of the Nuclear Energy (1 ppt)
<input type="checkbox"/>	4:00 PM – 5:00 PM	Video-call: Outreach on Climate Rules for the Power Sector (1 word doc, 1 ppt)
<input type="checkbox"/>	5:00 PM – 5:45 PM	San Joaquin Valley PM2.5 Small Check-in
<input type="checkbox"/>	5:45 PM – 6:15 PM	General Discussion
<input type="checkbox"/>	After 6:15 PM	Free

Daniel Hooper
Assistant Chief of Staff
Office of Air and Radiation, US EPA
hooper.daniel@epa.gov
202.343.9167 office

Pronouns: He/Him/His

Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 2/10/2022 1:09:36 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]; Fugh, Justina [Fugh.Justina@epa.gov]
Subject: RE: The Never-Ending Story

Hi Joe,

Good timing! This was on my list to raise with you because I figured OCIR would be reaching out soon. We can definitely assist with the ethics questions. I'll take a look at and get back to you shortly.

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Thursday, February 10, 2022 7:54 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: The Never-Ending Story

Hi, Shannon and Justina. I'm so sorry to bother you again, but I'm hoping to get a bit more advice. Assuming that Justina is right and that all that is left to do is for the administration to put my name forward for the OAR AAsip, I gather that I have to submit answers to a Senate Questionnaire. Have you had any experience advising would-be nominees on how to answer some of the financial and conflicts questions? If so, would be willing to take a look at the questions below and let me know how you think I should answer them or what other nominees that you've worked with have done (e.g., incorporate by reference the 278 and current Ethics and Recusal Agreements)? Thanks.

Note: The Office of Government Ethics will provide the Committee with a copy of your Executive Personnel Financial Disclosure Report (SF-278).

1. List sources, amounts and dates of all anticipated receipts from deferred income arrangements, stock options, uncompleted contracts and other future benefits which you expect to derive from previous business relationships, professional services and firm memberships or from former employers, clients, and customers. Amounts should be indicated by the categories established for reporting income on Form SF-278, Schedule A.

2. Are any assets pledged?

____ Yes. If so, please explain:

____ No

Potential conflicts of interest:

1. Describe any financial or deferred compensation agreements or other continuing of interest: dealings with business associates, clients or customers who will be affected by policies which you will influence in the position to which you have been nominated.

Not Applicable

2. List any investments, obligations, liabilities, or other relationships which might involve potential conflicts of interest, or the appearance of conflicts of interest, with the position to which you have been nominated.

3. Describe any business relationship, dealing or financial transaction (other than taxpaying) which you have had during the last 10 years with the Federal Government, whether for yourself or relatives, on behalf of a client, or acting as an agent, that might in any way constitute or result in a possible conflict of interest, or an appearance of conflict of interest, with the position to which you have been nominated.

Not Applicable

4. Explain how you will resolve any potential conflict of interest, or appearance of a conflict of interest, that may be disclosed by your responses to the above items.

5. Explain how you will comply with conflict of interest laws and regulations applicable to the position for which you have been nominated. Attach a statement from the appropriate agency official indicating what those laws and regulations are and how you will comply with them. For this purpose, you may utilize a statement by the relevant agency Ethics Officer.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

Message

From: O'Donnell, Sean [ODonnell.Sean@epa.gov]
Sent: 8/18/2021 1:00:02 PM
To: Fugh, Justina [Fugh.Justina@epa.gov]
CC: May, Benjamin [May.Benjamin@epa.gov]
Subject: Re: PPT Goffman Complaint

Thanks, Justina, this is helpful. I sent this to our Hotline for processing.

On Aug 17, 2021, at 11:54 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

Ex. 5 Deliberative Process (DP)

- On 8/4/21, OGC Ethics provided an interim FOIA response to Ms. Morgan Yardis of Protect the Public's Trust (EPA-2021-004097). She had requested various ethics-related records produced by or received by the Office of General Counsel, Ethics Office (OGC/Ethics) and EPA's Designated Agency Ethics Official pertaining or relating to twelve identified political appointees, including Mr. Goffman. That's how she received the referenced documents.
- Please note that we do not assert attorney-client privilege. As set forth at 5 C.F.R. § 2635.107, "[d]isclosures made by an employee to an agency ethics official are not protected by an attorney-client privilege." We may, though, assert deliberative process privilege and privacy rights.
- With respect to Mr. Goffman, I communicated with the White House Counsel's Office, and they concurred in my approach to redress the apparent oops. That email was not included in our interim response on 8/4/21 because we had not yet received clearance from them. We have since received clearance, however, and will include that email exchange in our next interim release.
- Just so you know, Executive Order 13989 does allow for pledge waivers, and those determinations have been delegated by the Office of Management and Budget to the Agency DAEs.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,

Morgan Yardis

<Goffman IG complaint 1.pdf>

Message

From: Fugh, Justina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=54AFBE2E36D3481C8C52D27BA3979D47-JFUGH]
Sent: 5/3/2021 3:09:59 AM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: FW: notification of (minor) pledge violation
Attachments: Signed recusal 4-8-21.docx

Hi,

For your annual questionnaire file.... I guess this counts as a pledge violation and a referral. I notified the Chief of Staff and the White House (they declined to take any action), told Dave Apol at OGE, and sent the email below to the IG hotline. I don't think anyone is going to follow up because we've resolved everything and the situation was very minor.

Justina

From: Fugh, Justina
Sent: Sunday, May 02, 2021 11:08 PM
To: OIG Hotline <OIG_Hotline@epa.gov>
Subject: notification of (minor) pledge violation

Hi there,

One of our non-career SES appointees, Joseph Goffman, realized belatedly that he acted on an email sent by a representative of his former employer, which is a technical violation of Section 2 of Executive Order 13989 and also of the impartiality standards at 5 C.F.R. § 2635.502(b)(1)(iv). Mr. Goffman did not respond directly to the requestor but did forward the email to a subordinate with a recommendation about how to proceed. He copied the career chief of staff on that email, who alerted the appointee about his error, so he notified me.

This appointee had issued a recusal statement (see attached) that names the career chief of staff as his screener. In addition, my staff had provided all of the politicals and key career staff in this office with specialized training on invitations and recusals. Nevertheless, the oops occurred. To "unring the bell," I advised the subordinate to disregard the instructions from the appointee. I also contacted the requestor to explain that the appointee would not be available to meet and that, going forward, any further inquiries should be sent to the career chief of staff in OAR instead. I have received confirmation from the requestor that they understand the restrictions. Finally, I have reminded the appointee to be more careful going forward.

Although a technical violation of the pledge, I don't see that there are any ramifications. The error has been corrected. I have notified the EPA Chief of Staff and the White House already, and White House Counsel's office has declined to take any further action on the pledge violation. I believe that we and the appointee have taken all necessary steps to resolve this minor situation, but because there is also a technical violation of the impartiality regulations by a senior official, I am notifying your office as a courtesy.

Please let me know if you want to follow up or have any questions.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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Message

From: Fugh, Justina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=54AFBE2E36D3481C8C52D27BA3979D47-JFUGH]
Sent: 8/18/2021 8:52:51 PM
To: Kafka, Kristin [kafkafody.kristin@epa.gov]
CC: May, Benjamin [May.Benjamin@epa.gov]
Subject: RE: PPT Goffman Complaint
Attachments: FW: Mercury science; RE: Please disregard any involvement by Joe Goffman in this request; request for a meeting with Joe Goffman; Signed recusal 4-8-21.docx

Hi Kristin,

I've been the Alternate Designated Agency Ethics Official for the past 15 years (yikes!) so have familiarity with the last three pledges: Executive Order 13989 (Biden ethics pledge), Executive Order 13770 (Trump ethics pledge), and Executive Order 13490 (Obama ethics pledge).

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

In the event that additional information is helpful to you, though, please consider the attached documents. You will see that Joe Goffman contacted me directly, I interacted the OAR chief of staff, and I notified Harvard that EPA would not take any action based on their communication with Mr. Goffman. I referred Harvard instead to the OAR chief of staff, who is the appropriate person identified in Mr. Goffman's recusal statement (also attached).

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Kafka, Kristin <kafkafody.kristin@epa.gov>
Sent: Wednesday, August 18, 2021 9:29 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: May, Benjamin <May.Benjamin@epa.gov>
Subject: RE: PPT Goffman Complaint

Good morning Justina,

Thank you for providing this information, it is helpful. My office will be reviewing the PPT complaint, so if you come across any additional information please forward it to me. I'd certainly like to follow up with you on this after I've digested this information.

If you have any immediate questions or concerns, please don't hesitate to reach out.

Very truly,

Kristin

Kristin M. Kafka
Deputy Assistant Inspector General for Administrative Investigations
Office of Special Review and Evaluation
Office of Inspector General
U.S. Environmental Protection Agency
(202) Ex. 5 Personal Privacy (PP)

From: "Fugh, Justina" <Fugh.Justina@epa.gov>
Date: August 17, 2021 at 11:54:02 PM EDT
To: "O'Donnell, Sean" <ODonnell.Sean@epa.gov>
Cc: "May, Benjamin" <May.Benjamin@epa.gov>
Subject: FW: PPT Goffman Complaint

Hi there,

Ex. 5 Deliberative Process (DP)

- On 8/4/21, OGC Ethics provided an interim FOIA response to Ms. Morgan Yardis of Protect the Public's Trust (EPA-2021-004097). She had requested various ethics-related records produced by or received by the Office of General Counsel, Ethics Office (OGC/Ethics) and EPA's Designated Agency Ethics Official pertaining or relating to twelve identified political appointees, including Mr. Goffman. That's how she received the referenced documents.
- Please note that we do not assert attorney-client privilege. As set forth at 5 C.F.R. § 2635.107, "[d]isclosures made by an employee to an agency ethics official are not protected by an attorney-client privilege." We may, though, assert deliberative process privilege and privacy rights.
- With respect to Mr. Goffman, I communicated with the White House Counsel's Office, and they concurred in my approach to redress the apparent oops. That email was not included in our interim response on 8/4/21 because we had not yet received clearance from them. We have since received clearance, however, and will include that email exchange in our next interim release.
- Just so you know, Executive Order 13989 does allow for pledge waivers, and those determinations have been delegated by the Office of Management and Budget to the Agency DAEs.

Ex. 5 Deliberative Process (DP)

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Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,

Morgan Yardis

Message

From: Fugh, Justina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=54AFBE2E36D3481C8C52D27BA3979D47-JFUGH]
Sent: 9/27/2021 8:15:04 PM
To: Ex. 6 Personal Privacy (PP); Ex. 7(C) @epa.gov]
Subject: FW: request for a meeting with Joe Goffman

FYI

From: Lambert, Kathleen Fallon <klambert@hsph.harvard.edu>
Sent: Thursday, April 22, 2021 4:53 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Campbell, Ann <Campbell.Ann@epa.gov>
Subject: RE: request for a meeting with Joe Goffman

Dear Ms. Fugh,
Thank you for explaining and upholding these ethical obligations.

Sincerely,
Kathy Fallon Lambert

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Wednesday, April 21, 2021 8:22 PM
To: Lambert, Kathleen Fallon <klambert@hsph.harvard.edu>
Cc: Campbell, Ann <Campbell.Ann@epa.gov>
Subject: request for a meeting with Joe Goffman

Dear Ms. Lambert,
My name is Justina Fugh, and I am the Director of EPA's Ethics Office. I am writing to explain that Joe Goffman will not be able to respond to your request nor will he be able to meet with you. As a political appointee, Mr. Goffman signed the Biden Ethics Pledge as required by Executive Order 13989. He is prohibited from participating in any particular matter involving specific parties that relates to his former employer, Harvard University. Unfortunately, this restriction means that he is unable to act upon your request and cannot meet with you or even direct you to someone else in his office. For two years, he is fully recused from engaging as part of his official EPA duties with any representative from Harvard.

Should you wish to meet with EPA's Office of Air and Radiation, then please send your request to Ann (Campbell) Ferrio, chief of staff of the Office of Air and Radiation, copied here. Ms. Ferrio will consider your request and, if appropriate, route it to the correct part of her office.

Thank you for your interest in the work of this Agency, and I hope that you understand why it is important to Mr. Goffman and EPA that he navigate his ethical obligations carefully.
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Lambert, Kathleen Fallon <klambert@hsph.harvard.edu>
Sent: Thursday, April 15, 2021 8:11 PM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>
Subject: Mercury science

Joe,

Would it be possible to get on your schedule for a 30-minute meeting on mercury science update with Drs. Elsie Sunderland (Harvard), Charles Driscoll (Syracuse) and myself on April 29, 30, or May 3, 4, or 5?

Thank you,

Kathy Fallon Lambert
Senior Advisor, Center for Climate, Health and the Global Environment ([C-CHANGE](#))
Harvard T.H. Chan School of Public Health
Co-founder, [Science Policy Exchange](#)
Tel. 802-436-1000
Twitter @kflambert
skype name kathleen.lambert31

For information and updates on the Transportation, Equity, Climate and Health (TRECH) Study, visit:
<https://www.hsph.harvard.edu/c-change/news/trechstudy/>

For stories of climate hope and action, subscribe to *The Climate Optimist* newsletter: <https://hsph.me/ClimateOptimist>

Message

From: Fugh, Justina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=54AFBE2E36D3481C8C52D27BA3979D47-JFUGH]
Sent: 9/27/2021 8:21:46 PM
To: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov
Subject: FW: notification of (minor) pledge violation

FYI

From: Olorunnipa, Funmi B. EOP/WHO [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, April 27, 2021 3:31 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: notification of (minor) pledge violation

Thank Justina. We defer to the agencies on whom to notify but your course of action below seems reasonable to me.

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Tuesday, April 27, 2021 1:42 PM
To: Olorunnipa, Funmi B. EOP/WHO [Ex. 6 Personal Privacy (PP)]
Subject: notification of (minor) pledge violation

Hi there,

One of our non-career SES appointees, Joseph Goffman, realized belatedly that he acted on an email sent by a representative of his former employer, which is a technical violation of Section 2 of Executive Order 13989. He did not respond directly to the requestor but did forward the email to a subordinate with a recommendation about how to proceed. He copied the career chief of staff on that email, who alerted the appointee to his error, so he notified me.

This appointee had issued a recusal statement that names the career chief of staff as his screener. In addition, my staff had provided all of the politicals and key career staff in this office with specialized training on invitations and recusals. Nevertheless, the oops occurred. To "unring the bell," I advised the subordinate to disregard the instructions from the appointee. I also contacted the requestor to explain that the appointee would not be available to meet and that, going forward, any further inquiries should be sent to the career chief of staff instead. And I have reminded the appointee to be more careful going forward.

Do you have any advice about whom else to notify about this minor pledge violation?

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

Message

From: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov]
Sent: 9/27/2021 7:54:51 PM
To: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: RE: PPT Goffman Complaint

Thanks so much! I'm not sure I'd know how to find your Outlook calendar. Can I just give you a quick call now?

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, September 27, 2021 3:53 PM
To: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov>
Subject: RE: PPT Goffman Complaint

Sure! As it happens, I have no meetings for the rest of today. My calendar is up to date in Outlook if you want to find another spot.

Cheers,
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov>
Sent: Monday, September 27, 2021 3:52 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: PPT Goffman Complaint

Hello Ms. Fugh,

I'm an investigative attorney working with Kristin Kafka in the OIG's office. Do you have a few minutes in the next few days to speak about the issue below? Thanks very much.

Regards,

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

Investigative Attorney
Administrative Investigations Directorate
Office of Special Review and Evaluation
Office of Inspector General
U.S. Environmental Protection Agency

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Wednesday, August 18, 2021 4:53 PM
To: Kafka, Kristin <kafkafody.kristin@epa.gov>
Cc: May, Benjamin <May.Benjamin@epa.gov>
Subject: RE: PPT Goffman Complaint

Hi Kristin,

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Ex. 5 Deliberative Process (DP)

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Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Kafka, Kristin <kafkafody.kristin@epa.gov>
Sent: Wednesday, August 18, 2021 9:29 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: May, Benjamin <May.Benjamin@epa.gov>
Subject: RE: PPT Goffman Complaint

Good morning Justina,

Thank you for providing this information, it is helpful. My office will be reviewing the PPT complaint, so if you come across any additional information please forward it to me. I'd certainly like to follow up with you on this after I've digested this information.

If you have any immediate questions or concerns, please don't hesitate to reach out.

Very truly,

Kristin

Kristin M. Kafka
Deputy Assistant Inspector General for Administrative Investigations
Office of Special Review and Evaluation
Office of Inspector General
U.S. Environmental Protection Agency
(202) Ex. 5 Personal Privacy (PP)

From: "Fugh, Justina" <Fugh.Justina@epa.gov>
Date: August 17, 2021 at 11:54:02 PM EDT
To: "O'Donnell, Sean" <ODonnell.Sean@epa.gov>
Cc: "May, Benjamin" <May.Benjamin@epa.gov>
Subject: FW: PPT Goffman Complaint

Hi there,

Ex. 5 Deliberative Process (DP)

- On 8/4/21, OGC Ethics provided an interim FOIA response to Ms. Morgan Yardis of Protect the Public's Trust (EPA-2021-004097). She had requested various ethics-related records produced by or received by the Office of General Counsel, Ethics Office (OGC/Ethics) and EPA's Designated Agency Ethics Official pertaining or relating to twelve identified political appointees, including Mr. Goffman. That's how she received the referenced documents.
- Please note that we do not assert attorney-client privilege. As set forth at 5 C.F.R. § 2635.107, "[d]isclosures made by an employee to an agency ethics official are not protected by an attorney-client privilege." We may, though, assert deliberative process privilege and privacy rights.
- With respect to Mr. Goffman, I communicated with the White House Counsel's Office, and they concurred in my approach to redress the apparent oops. That email was not included in our interim response on 8/4/21 because we had not yet received clearance from them. We have since received clearance, however, and will include that email exchange in our next interim release.
- Just so you know, Executive Order 13989 does allow for pledge waivers, and those determinations have been delegated by the Office of Management and Budget to the Agency DAEs.
- Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone
202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,

Morgan Yardis

Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 9/27/2021 9:03:12 PM
To: Fugh, Justina [Fugh.Justina@epa.gov]
CC: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov
Subject: RE: Goffman's signed pledge
Attachments: Goffman, Joseph.pdf

Here you go!

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, September 27, 2021 4:36 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov
Subject: Goffman's signed pledge

Hi Shannon,
Could you please send to [redacted] our latest new IG friend, the pdf of Joe Goffman's signed pledge for his files?
Thanks!
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone
202-564-1786 | fax 202-564-1772

Message

From: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov]
Sent: 9/27/2021 9:09:14 PM
To: Griffio, Shannon [Griffio.Shannon@epa.gov]; Fugh, Justina [Fugh.Justina@epa.gov]
Subject: RE: Goffman's signed pledge

Thank you so much!

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

Investigative Attorney
Administrative Investigations Directorate
Office of Special Review and Evaluation
Office of Inspector General
U.S. Environmental Protection Agency

[Ex. 6 Personal Privacy (PP); Ex. 7(C)]

From: Griffio, Shannon <Griffio.Shannon@epa.gov>
Sent: Monday, September 27, 2021 5:03 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov>
Subject: RE: Goffman's signed pledge

Here you go!

Thanks,
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, September 27, 2021 4:36 PM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Cc: [Ex. 6 Personal Privacy (PP); Ex. 7(C)]@epa.gov>
Subject: Goffman's signed pledge

Hi Shannon,
Could you please send to [redacted] our latest new IG friend, the pdf of Joe Goffman's signed pledge for his files?
Thanks!
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone
202-564-1786 | fax 202-564-1772

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 11/10/2021 11:57:11 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Re: FW: Confirmatory e-mail prior to preclearance review for Joseph Goffman - [Message contains CUI]

I just realized that the "discretionary trust" question might have taken you aback. I just reviewed the "First Round" document that you transmitted last month and realized that we answered basically the same question in Part 6 on page 4, although it seems that the answer provided was to list and describe the trusts without providing a "yes" or "no" response. So, it's still a bit of a mystery to me what that term means exactly. Thanks, again.

On Wed, Nov 10, 2021 at 3:48 PM Joseph Goffman [Ex. 6 Personal Privacy (PP)] wrote:

Thanks, Shannon. I will do my best to get this done quickly, but as you know I am at the COP and then have to attend to a family matter in California. So, I may not be able to get this done until next week.

One question (which I probably should know the answer to): what is a "discretionary trust" or, alternatively, how does OGE define that term?

Thanks, again.

On Wed, Nov 10, 2021 at 8:38 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

OGE now needs your affirmation that your Nominee Report is accurate, so I need you to personally review your Nominee Report in Integrity very carefully. See message below. Don't make any changes to the report itself. If you notice an error, let me know.

I've also attached the current draft of your Ethics Agreement which you should review. This is standard language that comes directly from OGE's EA Guide/template. This will be part of your pre-clearance package that goes with your Nominee Report. But also note that this is subject to change if OGE comes back and says you need to have additional divestiture(s). However, this is the current draft that OGE and I have agreed upon.

Set forth below are the material representations upon which EPA and OGE are relying. Again, please review them and let me know immediately if any of these are incorrect. But (and this is important) don't make any changes to the report itself. Just tell me what the error is.

- You have personally reviewed all entries in the current version of the financial disclosure report and have affirmed that they are correct.
- For Part 1 and Part 4, you have provided information covering the entire reporting period of January 1, 2019, to date of signing (September 23, 2021).
- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing (September 21, 2021).
- You are not a trustee of any trust.

- **Ex. 6 Personal Privacy (PP)** you yourself do not have any beneficial interests in trusts. Also, you, **Ex. 6 Personal Privacy (PP)** do not have any beneficial interests in discretionary trusts.
- The ethics agreement correctly describes all items addressed in the agreement. Further, you understand that the commitments that you are making to the Senate and will be able to fulfill these commitments within the stated timeframes.

After I hear back from you, OGE reviews the report for the preclearance stage.

Thanks Joe!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Stephanie Nonluecha <snonlue@oge.gov>
Sent: Wednesday, November 10, 2021 2:47 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Confirmatory e-mail prior to preclearance review for Joseph Goffman - [Message contains CUI]

CONTROLLED

Hi Shannon,

The U.S. Office of Government Ethics (OGE) will be reviewing Mr. Goffman's report for "preclearance."
Please be sure to instruct Mr. Goffman to personally review the report carefully once more, given that he will be personally responsible for all entries in the report as they currently appear.

Before OGE reviews this report for preclearance, I'm sending you a list of some of Mr. Goffman's material representations on which we are relying. Please forward this message to Mr. Goffman and instruct him to notify you immediately if any item in this list is incorrect.

Among other material representations, we are relying on the following:

- Mr. Goffman has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct.
- For Part 1 and Part 4, Mr. Goffman has provided information covering the entire reporting period of January 1, **2019**, to date of signing.
- For Part 2, Part 5, Part 6, and Part 8, Mr. Goffman has provided information covering the entire reporting period of January 1, **2020**, to date of signing.

- Mr. Goffman is not a trustee of any trust.

- **Ex. 6 Personal Privacy (PP)** Mr. Goffman himself does not have any beneficial interests in trusts. Also, Mr. Goffman, **Ex. 6 Personal Privacy (PP)** do not have any beneficial interests in discretionary trusts.

- The ethics agreement correctly describes all items addressed in the agreement. Further, Mr. Goffman understands the commitments that he is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thanks,

Stephanie Nonluecha

Program Analyst

Presidential Nominations Branch

U.S. Office of Government Ethics

(202) 482-9243

snonlue@oge.gov <<mailto:snonlue@oge.gov>>

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Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 11/10/2021 8:38:40 PM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: FW: Confirmatory e-mail prior to preclearance review for Joseph Goffman - [Message contains CUI]
Attachments: Draft EA for preclearance.Goffman Joseph.docx

Hi Joe,

OGE now needs your affirmation that your Nominee Report is accurate, so I need you to personally review your Nominee Report in Integrity very carefully. See message below. Don't make any changes to the report itself. If you notice an error, let me know.

I've also attached the current draft of your Ethics Agreement which you should review. This is standard language that comes directly from OGE's EA Guide/template. This will be part of your pre-clearance package that goes with your Nominee Report. But also note that this is subject to change if OGE comes back and says you need to have additional divestiture(s). However, this is the current draft that OGE and I have agreed upon.

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- For Part 2, Part 5, Part 6, and Part 8, you have provided information covering the entire reporting period of January 1, 2020, to date of signing (September 21, 2021).
- You are not a trustee of any trust.
- Ex. 6 Personal Privacy (PP) you yourself do not have any beneficial interests in trusts. Also, you; Ex. 6 Personal Privacy (PP) do not have any beneficial interests in discretionary trusts.
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After I hear back from you, OGE reviews the report for the preclearance stage.

Thanks Joe!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Stephanie Nonluecha <snonlue@oge.gov>
Sent: Wednesday, November 10, 2021 2:47 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Confirmatory e-mail prior to preclearance review for Joseph Goffman - [Message contains CUI]

CONTROLLED

Hi Shannon,

The U.S. Office of Government Ethics (OGE) will be reviewing Mr. Goffman's report for "preclearance." **Please be sure to instruct Mr. Goffman to personally review the report carefully once more**, given that he will be personally responsible for all entries in the report as they currently appear.

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Among other material representations, we are relying on the following:

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- The ethics agreement correctly describes all items addressed in the agreement. Further, Mr. Goffman understands the commitments that he is making to the Senate and will be able to fulfill these commitments within the stated timeframes.

Thanks,

Stephanie Nonluecha
Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
(202) 482-9243
snonlue@oge.gov <<mailto:snonlue@oge.gov>>

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From: Joseph Goffmar [Ex. 6 Personal Privacy (PP)]
Sent: 11/12/2021 5:16:29 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Re: Responses to your questions

Thanks for getting back to me, Shannon. Does the credit card reporting obligation apply only to me or does it apply to both me and my spouse? [Ex. 6 Personal Privacy (PP)]

My questions about the trusts [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

[Ex. 5 Deliberative Process (DP)] Apologies if I'm making this torturous, but I want to make sure I respond with the complete accuracy and precision that is required.

Thanks, again.

On Fri, Nov 12, 2021 at 11:33 AM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Let me try to answer all your questions (in red). Let me know if I missed something though.

Justina, do you have anything else to add about the discretionary trust piece? See page 4 for how Joe previously answered the question about trusts.

1. The valuations for the holdings need to be accurate as of the date the Report was filed and don't need to be updated, right? Correct. Accurate as of date signed, which was September 23, 2021. That's also the date [Ex. 6 Personal Privacy (PP)] used. No need to update.

2. Credit card balances are exempt no matter how big they are, right? Incorrect. You must report revolving charge accounts, such as credit card balances, provided that the outstanding liability did not exceed \$10,000 at the close of the reporting period. So if you had any credit card balances over \$10,000 as of September 23, 2021, those should be reported.

3. Discretionary Trust question. Joe - [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

In the older OGE guidance I found, OGE defines "discretionary trust" as "a trust whose terms provide that the trustee pays to a beneficiary 'only so much of the income and principal or either as the trustee in his uncontrolled discretion shall see fit.' ...It is the essence of a 'true discretionary trust'...that there is a discretion

to give the named beneficiary some benefits under the trust or to give him nothing. In short, a discretionary trust does not give the beneficiary an enforceable right to payment.”

I’m also a little confused about the question.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman <**Ex. 6 Personal Privacy (PP)**>
Sent: Wednesday, November 10, 2021 8:00 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Last two questions for this evening

1. The valuations for the holdings need to be accurate as of the date the Report was filed and don't need to be updated, right?
2. Credit card balances are exempt no matter how big they are, right?

Thanks.

Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 11/12/2021 4:33:31 PM
To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Responses to your questions
Attachments: First Round OGE Questions - Joseph Goffman Responses.docx

Hi Joe,

Let me try to answer all your questions (in red). Let me know if I missed something though.

Justina, do you have anything else to add about the discretionary trust piece? See page 4 for how Joe previously answered the question about trusts.

1. The valuations for the holdings need to be accurate as of the date the Report was filed and don't need to be updated, right? Correct. Accurate as of date signed, which was September 23, 2021. That's also the date [Ex. 6 Personal Privacy (PP)] used. No need to update.

2. Credit card balances are exempt no matter how big they are, right? Incorrect. You must report revolving charge accounts, such as credit card balances, provided that the outstanding liability did not exceed \$10,000 at the close of the reporting period. So if you had any credit card balances over \$10,000 as of September 23, 2021, those should be reported.

3. Discretionary Trust question. Joe - [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

In the older OGE guidance I found, OGE defines "discretionary trust" as "a trust whose terms provide that the trustee pays to a beneficiary 'only so much of the income and principal or either as the trustee in his uncontrolled discretion shall see fit.' ...It is the essence of a 'true discretionary trust'...that there is a discretion to give the named beneficiary some benefits under the trust or to give him nothing. In short, a discretionary trust does not give the beneficiary an enforceable right to payment."

I'm also a little confused about the question. [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Wednesday, November 10, 2021 8:00 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Last two questions for this evening

1. The valuations for the holdings need to be accurate as of the date the Report was filed and don't need to be updated, right?

2. Credit card balances are exempt no matter how big they are, right?

Thanks.

Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 11/29/2021 11:18:18 PM
To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: RE: Draft response for OGE for your review

You are quite welcome! I'm sending it over now. I'll let you know as soon as we hear anything back.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Monday, November 29, 2021 6:11 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Draft response for OGE for your review

Thank you, Shannon. I believe this is ready to transmit to OGE. Really, really appreciate the care and perseverance you invested in all this and thank you, Justina, for the guidance you've provided as well.

On Mon, Nov 29, 2021 at 6:03 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Now that everyone has finished their review (and I incorporated [Ex. 6 Personal Privacy (PP)] most recent comments from this evening), attached is the chart that I've put together to send to OGE along with draft responses to the material representations in red. Please take one last look and let me know if you have any additional comments or edits to add. Then I'll get it over to OGE. Thanks!

- Mr. Goffman has personally reviewed all entries in the current version of the financial disclosure report and has affirmed that they are correct. Mr. Goffman has personally reviewed all entries in the current version of the financial disclosure report, and attached is a chart that reflects the line items where changes are needed.
- For Part 1 and Part 4, Mr. Goffman has provided information covering the entire reporting period of January 1, **2019**, to date of signing. Confirmed.
- For Part 2, Part 5, Part 6, and Part 8, Mr. Goffman has provided information covering the entire reporting period of January 1, **2020**, to date of signing. Confirmed but please see the attached chart.
- Mr. Goffman is not a trustee of any trust. Confirmed.
- [Ex. 6 Personal Privacy (PP)] Mr. Goffman himself does not have any beneficial interests in trusts. Also, Mr. Goffman, [Ex. 6 Personal Privacy (PP)] do not

have any beneficial interests in discretionary trusts. Mr. Goffman has reported

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

- The ethics agreement correctly describes all items addressed in the agreement. Further, Mr. Goffman understands the commitments that he is making to the Senate and will be able to fulfill these commitments within the stated timeframes. Confirmed.

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Stephanie Nonluecha <snonlue@oge.gov>

Sent: Wednesday, November 10, 2021 2:47 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: Confirmatory e-mail prior to preclearance review for Joseph Goffman - [Message contains CUI]

CONTROLLED

Hi Shannon,

The U.S. Office of Government Ethics (OGE) will be reviewing Mr. Goffman's report for "preclearance." **Please be sure to instruct Mr. Goffman to personally review the report carefully once more**, given that he will be personally responsible for all entries in the report as they currently appear.

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- For Part 2, Part 5, Part 6, and Part 8, Mr. Goffman has provided information covering the entire reporting period of January 1, 2020, to date of signing.

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Thanks,

Stephanie Nonluecha
Program Analyst
Presidential Nominations Branch
U.S. Office of Government Ethics
(202) 482-9243
snonluc@oge.gov <<mailto:snonluc@oge.gov>>

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Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 1/21/2022 11:16:59 PM
To: 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Update from OGC/Ethics
Attachments: Joseph Goffman Nominee Report Changes.docx

Hi Joe,

I spoke with OGE earlier today. We've been asked to go into INTEGRITY and make those changes that we identified two months ago. As a reminder, attached is the chart that we sent to OGE. Once those changes are made, OGE has asked that you go into your report once again to make sure everything looks good. And then once you've reviewed it, I'll send OGE another confirmation email.

I also need to confirm with [Ex. 6 Personal Privacy (PP)] whether any assets were sold this week – because if so, OGE has asked that we add an endnote saying that the asset was sold subsequent to filing. I'll reach out to [Ex. 6 Personal Privacy (PP)] and I'll make those changes to your report this weekend. Then I'll circle back once it's ready for you to review.

Thanks!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/23/2022 10:49:08 PM
To: Griffio, Shannon [Griffo.Shannon@epa.gov]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Re: Update from OGC/Ethics

Thanks for responding. So sorry to hear about your
That's what's in the 2017 Termination Report, right? Thanks, again.

Ex. 6 Personal Privacy (PP)

On Sun, Jan 23, 2022 at 3:58 PM Griffio, Shannon <Griffo.Shannon@epa.gov> wrote:

I'll put it in Part 1 and flag the addition for OGE. I'll also mention
Ex. 6 Personal Privacy (PP)
Ex. 6 Personal Privacy (PP)

As Justina knows, we've been dealing with [Ex. 6 Personal Privacy (PP)] this past week. And it looks like this upcoming week will be impacted as well. So my schedule is a little different. Fun times around here!

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Saturday, January 22, 2022 8:51 PM
To: Griffio, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Update from OGC/Ethics

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Thanks so much for checking -- on a Saturday night no less.

On Sat, Jan 22, 2022 at 8:43 PM Griffio, Shannon <Griffo.Shannon@epa.gov> wrote:

This is the first time I've heard of it. I went back to your New Entrant Report filed a year ago and the only position on there was Harvard. I also pulled up your Termination Report from 2017, and I do see [Ex. 6 Personal Privacy (PP)]

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Saturday, January 22, 2022 12:48 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Update from OGC/Ethics

Hi, Shannon. I was just re-familiarizing myself with the SF-278 in anticipation of responding to the next round of changes and confirming the accuracy of the information in the 278, and I couldn't find a reference to [Ex. 6 Personal Privacy (PP)] I was sure that I had included that in the earlier filing. Did I miss it just now, or did it never make it into the 278? Obviously, I certainly hope it's not the latter. Thanks.

On Fri, Jan 21, 2022 at 6:57 PM Joseph Goffman [Ex. 6 Personal Privacy (PP)] wrote:

Hi, Shannon. Thanks so much for the update, and as always for all the great work you are doing on this. Have a good weekend.

On Fri, Jan 21, 2022 at 6:17 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

I spoke with OGE earlier today. We've been asked to go into INTEGRITY and make those changes that we identified two months ago. As a reminder, attached is the chart that we sent to OGE. Once those changes are made, OGE has asked that you go into your report once again to make sure everything looks good. And then once you've reviewed it, I'll send OGE another confirmation email.

I also need to confirm with [] whether any assets were sold this week – because if so, OGE has asked that we add an endnote saying that the asset was sold subsequent to filing. I'll reach out to [] and I'll make those changes to your report this weekend. Then I'll circle back once it's ready for you to review.

Thanks!

Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [Griffo.Shannon@epa.gov]
Sent: 1/31/2022 7:06:34 PM
To: Goffman, Joseph [Goffman.Joseph@epa.gov]
CC: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: RE: News about your upcoming financial disclosure filing requirement
Attachments: How to Pre-populate a Report.docx

Good news! We reached out to the Integrity Help Desk to inquire whether the Nominee report could be used to pre-populate your Annual/incumbent report. And we were told that yes, you can use any report (including drafts or “in progress”) to pre-populate. So you should be able to transfer that information from your Nominee Report. Attached are the instructions.

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Monday, January 31, 2022 8:06 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: News about your upcoming financial disclosure filing requirement

Following up with what I think is a not insane question: given the amount of work that has gone into the Nominee version of the 278, are there any efficiencies we can harvest so that Ex. 6 Personal Privacy (PP) and I don't have to start from scratch on this report? Is there a way to “migrate” the data from the latest nominee report as I recall was done between the Spring 2020 version of the nominee report and the more recent September draft? Thanks.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Friday, January 28, 2022 5:07 PM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: News about your upcoming financial disclosure filing requirement

If it's whether you're going to have to file this incumbent report, then the answer is yes. Sorry! Feel free to reach out with specific questions or give me a ring next week.

Have a nice weekend!

Shannon Griffo
Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency
(202) 564-7061

From: Goffman, Joseph <Goffman.Joseph@epa.gov>
Sent: Friday, January 28, 2022 2:06 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: News about your upcoming financial disclosure filing requirement

I have questions.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Friday, January 28, 2022 2:04 PM
To: Adhar, Radha <Adhar.Radha@epa.gov>; Amin, Faisal <Amin.Faisal@epa.gov>; Arroyo, Victoria <Arroyo.Victoria@epa.gov>; Blythers, Dorian <Blythers.Dorian@epa.gov>; Carbonell, Tomas <Carbonell.Tomas@epa.gov>; Carroll, Timothy <Carroll.Timothy@epa.gov>; Cassady, Alison <Cassady.Alison@epa.gov>; Chase, Joann <Chase.Joann@epa.gov>; Chaudhary, Dimple <Chaudhary.Dimple@epa.gov>; Conger, Nick <Conger.Nick@epa.gov>; Diaz, Catherine <Diaz.Catherine@epa.gov>; Efron, Brent <Efron.Brent@epa.gov>; Engelman-Lado, Marianne <EngelmanLado.Marianne@epa.gov>; Enobakhare, Rosemary <Enobakhare.Rosemary@epa.gov>; Fine, Philip <Fine.Philip@epa.gov>; Fox, Radhika <Fox.Radhika@epa.gov>; Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Frey, Christopher <Frey.Christopher@epa.gov>; Garza, Johnathan <Garza.Johnathan@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>; Goldberg, Ruby <Goldberg.Ruby@epa.gov>; Green, Jamie <Green.Jamie.A@epa.gov>; Hamilton, Lindsay <Hamilton.Lindsay@epa.gov>; Harney, Alethea <Harney.Alethea@epa.gov>; Harris, Sincere <Harris.Sincere@epa.gov>; Hicks, Destine <Hicks.Destine@epa.gov>; Hoffer, Melissa <Hoffer.Melissa@epa.gov>; Hoover, Zealan <Hoover.Zealan@epa.gov>; Katims, Casey <Katims.Casey@epa.gov>; Kim, Eunjung <Kim.Eun@epa.gov>; Lance, Kathleen <Lance.Kathleen@epa.gov>; Laverdiere, Maria <Laverdiere.Maria@epa.gov>; Levy, Maxwell <Levy.Maxwell@epa.gov>; Li, Jake <Li.Jake@epa.gov>; Lucey, John <Lucey.John.D@epa.gov>; Macedonia, Jennifer <Macedonia.Jennifer@epa.gov>; andrew.mavock@ceq.eop.gov; McCabe, Janet <McCabe.Janet@epa.gov>; Michalos, Maria <Michalos.Maria@epa.gov>; Morgan, Ashley <Morgan.Ashley.M@epa.gov>; Niebling, William <Niebling.William@epa.gov>; Nishida, Jane <Nishida.Jane@epa.gov>; Nunez, Alejandra <Nunez.Alejandra@epa.gov>; O'Brien, Grant <OBrien.Grant@epa.gov>; Adm16.Michael.Regan <adm16.michael.regan@epa.gov>; Romer, Jennie <Romer.Jennie@epa.gov>; Cortez Russell, Loni <Russell.Loni@epa.gov>; Sabater, Juan <Sabater.Juan@epa.gov>; Schafer, Zach <Schafer.Zach@epa.gov>; Schreyer, Andrew <Schreyer.Andrew@epa.gov>; Shore, Debra <Shore.Debra@epa.gov>; Snyder, Rodney <Snyder.Rodney@epa.gov>; Utech, Dan <Utech.Dan@epa.gov>; Wachter, Eric <Wachter.Eric@epa.gov>; Waterhouse, Carlton <Waterhouse.Carlton@epa.gov>; Weaver, Susannah <Weaver.Susannah@epa.gov>
Subject: News about your upcoming financial disclosure filing requirement

Hi there,

As you are undoubtedly – and perhaps even painfully -- aware, you are in a position that requires you to file the public financial disclosure report (also known as the 278). You previously filed a new entrant report, but I warned you that you have a continuing obligation to file these reports. If you joined EPA between 1/20/21 and 11/1/21, then you'll need to file an incumbent report this year (but if you started at EPA after 11/1/21, then you don't file until 2023). For those of you who joined before 11/1/21, your report will be similar to what you filed previously, but there are some differences:

- This report will cover only CY 2021, so from the date you started at EPA through 12/31/21;
- You will be able to pre-populate your previous form into the one that you file this year;

- You will now have to report on any gifts received from non-relatives that exceeded \$415; and
- You will have to report transactions of more than \$1000, including mutual funds or 529 plans.

We will assign your incumbent reports to you *in late February* and your due date will be May 16. And, hey, since I have your attention, let's review some important reminders:

- *Don't forget about periodic transaction reporting!* You are required to report any transactions of stocks or bonds more than \$1000 within 30 days after receiving notice but not later than 45 days after the trade itself. To report this kind of transaction, submit a 278T in INTEGRITY. If you are late, then you are subject to an automatic late filing fee of \$200 for missing the deadline.
- *Keep track of your mutual fund transactions.* For this upcoming filing, you will have to report any transactions of \$1000 or more in mutual funds (including 529 plans) in the transactions section.
- *Late fees.* I've attached our reminder about late filing fees as well as a chart about transaction reporting. Alas, last year, we had to fine more than half a dozen people for late transaction filings.
- *Whom should you contact with questions?* Four of us in OGC/Ethics review 278s, so here's the list of contacts for you:

OGC/Ethics	ORGANIZATIONS
Victoria Clarke	OIG, OGC, OMS, OW, Regions 3 and 4
Justina Fugh	AO, OCFO, OITA and Regions 8, 9 and 10
Shannon Griffo	OAR, OCSPP, OECA and Regions 1 and 2
Ferne Mosley	OLEM, ORD and Regions 5, 6 and 7

Thanks for your attention to ethics issues, and I know you're eagerly anticipating the start of the public financial disclosure reporting season later in February!

Cheers,
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

Message

From: Joseph Goffman; **Ex. 6 Personal Privacy (PP)**
Sent: 10/14/2021 10:28:15 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: funds

Thanks so much, Shannon, and congratulations on getting us this far. Really appreciate it.

On Thu, Oct 14, 2021 at 6:16 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Thanks for letting me know.

Also, I spoke with OGE this afternoon. Your report is in good shape and we only need to do a few minor technical changes. Phew! I'll take care of the necessary edits. Again, it's just technical changes. But I am waiting for additional feedback from OGE on one of them, then I'll circle back with you on what I need – it's related to **Ex. 6 Personal Privacy (PP)** from Case Western.

This means we are now turning to the conflicts analysis. I'm going to write a summary for OGE related to this. But at this point, there's no action needed on your part. I'll keep you posted on our progress.

We'll also be able to start drafting your Ethics Agreement. More to follow on this so stay tuned!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman; **Ex. 6 Personal Privacy (PP)**
Sent: Thursday, October 14, 2021 11:08 AM
To: **Ex. 6 Personal Privacy (PP)**
Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: funds

Shannon - just talked to **Ex. 6 Personal Privacy (PP)** We have a workaround, so nothing needed from you at this moment. Thanks.

On Thu, Oct 14, 2021 at 10:58 AM Joseph Goffman **Ex. 6 Personal Privacy (PP)** wrote:

We probably need to hold off for at least a few days -- maybe until we get the next round of questions from OGE? Shannon -- please advise. Thanks.

On Thu, Oct 14, 2021 at 10:56 AM **Ex. 6 Personal Privacy (PP)** wrote:

Dear Joe,

Ex. 6 Personal Privacy (PP) Please advise if we can proceed.

Thanks,

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Tuesday, October 12, 2021 1:07 PM

To: Griffio, Shannon <Griffio.Shannon@epa.gov>

Cc **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

Subject: Re: One more question - Joe's report

Thank you, and echoing Shannon, thank you **Ex. 6 Personal Privacy (PP)** for all the help on this and for not fainting and running away when you read "we'll await the second round of questions."

On Tue, Oct 12, 2021 at 1:05 PM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Perfect. Both have been removed and I also **Ex. 6 Personal Privacy (PP)**

With that, I believe the second box on page 1 is now complete and the reporting periods are all confirmed.

Joe, I'm going to go ahead and send the attached chart to OGE. Then we'll await the second round of questions.

Thanks again everyone!

Shannon Griffio

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Ex. 6 Personal Privacy (PP)

Sent: Tuesday, October 12, 2021 12:01 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Joseph Goffman Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: RE: One more question - Joe's report

Hi Shannon,

Both can be removed Ex. 6 Personal Privacy (PP)

Regards,

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, October 12, 2021 11:48 AM

To: Joseph Goffman Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: One more question - Joe's report

WARNING: This e-mail originated from outside of Ex. 6 Personal Privacy (PP) Always use caution when opening attachments or clicking links.

Hi all,

I just wanted to say thanks again for all the help with Joe's report! There's only one outstanding question I had regarding Joe's

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) but I wasn't sure if there was another reason they are still listed. I had asked Ex. 6 Personal Privacy (PP) but I know he's got another upcoming deadline this week. So any feedback would be greatly appreciated. Then I'll be able to hit send on our responses to OGE!

Shannon Griffio

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 10/16/2021 12:28:09 AM
To: Griffio, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: Report follow-up (technical questions)

Thanks, Shannon. Have a great weekend.

On Fri, Oct 15, 2021 at 8:25 PM Griffio, Shannon <Griffo.Shannon@epa.gov> wrote:

Yes, I can continue to make all the changes. No problem at all. And you'll have a few more opportunities to review everything again.

For the Acting AA position, I checked in with Justina because I wasn't 100% sure OGE was correct that we'd have to list it. She's going to look into it more. I'll let you know where we come out on that one.

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Friday, October 15, 2021 4:17 PM
To: Griffio, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Report follow-up (technical questions)

For your Case Western article, OGE recommends that we call it an [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)] And we need to include the date that the article was published (because this was the date the service was provided). So just let me know the date – THE PUBLICATION DATES ITSELF AS "SUMMER 2020". IS THAT GOOD ENOUGH? IF NOT, MY MEMORY IS THAT IT WAS JULY, 2020.

OGE also recommends that we use generic terms for [Ex. 6 Personal Privacy (PP)] or any other identifying factors. We'd label them as [Ex. 6 Personal Privacy (PP)] Sound good? THAT'S OK IF THAT'S THE WAY THEY RECOMMEND.

OGE said to add your current "Acting Assistant Administrator" position to the cover page for federal positions held. Right now we just have your Principal Deputy position as Jan 2021 through the present. But when did you start the role as Acting AA? JANUARY 21, 2021.

Are you still OK adding this to the filing? Thanks.

On Fri, Oct 15, 2021 at 2:54 PM Griffio, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Three follow-up questions for you:

1. For your Case Western article, OGE recommends that we call it an **Ex. 6 Personal Privacy (PP)** **Ex. 6 Personal Privacy (PP)** And we need to include the date that the article was published (because this was the date the service was provided). So just let me know the date –

2. OGE also recommends that we use **Ex. 6 Personal Privacy (PP)** **Ex. 6 Personal Privacy (PP)** Sound good?

3. OGE said to add your current “Acting Assistant Administrator” position to the cover page for federal positions held. Right now we just have your Principal Deputy position as Jan 2021 through the present. But when did you start the role as Acting AA?

Thanks!

Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 11/17/2021 2:08:13 AM
To: Griffio, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: Follow-up - Credit Card Balance and Trusts

Thanks, Shanon. Really appreciate the follow up. Since the credit card [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)] Justina's advice seems good. Happy to use the statement about the trusts. In case
relevant, I have [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)]

Thank you as well for the email in response to mine about [Ex. 6 Personal Privacy (PP)] thorough review and what she spotted. I have
left a voicemail with [Ex. 6 Personal Privacy (PP)] flagging your email and asking him to confirm that he will take up the task
promptly.

On Tue, Nov 16, 2021 at 4:50 PM Griffio, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

I spoke with Justina about our credit card conversation and your email below. She said that for something like
this, [Ex. 5 Deliberative Process (DP)] She also said [Ex. 5 Deliberative Process (DP)]
[Ex. 5 Deliberative Process (DP)]
[Ex. 5 Deliberative Process (DP)] So let's go with what Justina says – this amount wouldn't be reportable.

Now turning to the discretionary trusts – [Ex. 5 Deliberative Process (DP)]
[Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

I think that just leaves double checking the assets. I'll respond to your other email, but since [Ex. 6 Personal Privacy (PP)] was the
one who entered all the data, I think he should be the one to double check [Ex. 6 Personal Privacy (PP)] findings/list and let us know
if anything needs to be changed. Perhaps you can nudge him and see when he'll be able to get to that once I
send my email. In the meantime, I'll give OGE a heads up that you're back in town and focusing your
attention on your report (meaning going through everything once again with a fine tooth comb....)

Thanks!
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Monday, November 15, 2021 8:43 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: Credit Card Balance

Hi, Shannon.

Ex. 6 Personal Privacy (PP)

Thanks.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 11/17/2021 9:59:42 PM
To: [Ex. 6 Personal Privacy (PP)]
CC: Griffo, Shannon [Griffo.Shannon@epa.gov]; [Ex. 6 Personal Privacy (PP)]
Subject: Re: review

Hi [Ex. 6 Personal Privacy (PP)] Thank you very much for taking care of this so promptly. Not sure if this request scans, but does it make sense to ask you to do the same fly-specking for the [Ex. 6 Personal Privacy (PP)] did for the Report entries for the other accounts? Or had you already done that at the time of or since I submitted the Report on September 23? Thanks, again.

On Wed, Nov 17, 2021 at 4:44 PM [Ex. 6 Personal Privacy (PP)] wrote:

Dear all,

We have gone through [Ex. 6 Personal Privacy (PP)] comments, below is our findings:

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Regards,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, November 16, 2021 5:08 PM

To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]

Cc: [Ex. 6 Personal Privacy (PP)]

Subject: RE: review

WARNING: This e-mail originated from outside of [Ex. 6 Personal Privacy (PP)] Always use caution when opening attachments or clicking links.

My recommendation is that [Ex. 6 Personal Privacy (PP)] reviews [Ex. 6 Personal Privacy (PP)] two lists, compares it to the information he used to enter the data, and then determine if anything on the current version of the report needs to be changed. It'd be great if we could compile a list of those things which I'd then relay to OGE. For the one [Ex. 6 Personal Privacy (PP)] doesn't manage, I'd just ask that someone take another close look at the statements and compare to the report (like [Ex. 6 Personal Privacy (PP)] did). And perhaps [Ex. 6 Personal Privacy (PP)] can do that with a fresh set of eyes.

And as far as missing items which were divested pursuant to the CDs, I previously told [Ex. 6 Personal Privacy (PP)] that they would not need to be reported since Joe no longer holds them and technically no "income" was received during the reporting period. His 278-Ts will suffice for those purposes.

Thanks all!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]

Sent: Tuesday, November 16, 2021 3:18 PM

To: [Ex. 6 Personal Privacy (PP)]

Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: Re: review

[Ex. 6 Personal Privacy (PP)]

Thanks so very much for all of the diligence on this, Ex. 6 Personal Privacy (PP) Shannon -- is there any follow up you need for me -- or any thing specific that Ex. 6 Personal Privacy (PP) needs to focus on, particularly with regard to reporting on the one Ex. 6 Personal Privacy (PP) does not manage? Thanks

On Tue, Nov 16, 2021 at 10:13 AM **Ex. 6 Personal Privacy (PP)** wrote:

Good morning Joe and Shannon,

Following are the remaining discrepancies in the remaining 3 accounts that we manage (We can not verify the **Ex. 6 Personal Privacy (PP)** Note that most of the missing items are those that Joe was asked to sell by OGE.

Feel free to call if you have any questions.

Fingers crossed for you, Joe!

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Ex. 6 Personal Privacy (PP)
Sent: 11/17/2021 10:09:41 PM
To: Ex. 6 Personal Privacy (PP); Griffo, Shannon [Griffo.Shannon@epa.gov]; Joseph Goffman
Ex. 6 Personal Privacy (PP)
Subject: RE: review

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Dear All,

Above are entries from **Ex. 6 Personal Privacy (PP)** website showing info we relied on to check reports.

Best,

Ex. 6 Personal Privacy (PP)

From: **Ex. 6 Personal Privacy (PP)**

Sent: Wednesday, November 17, 2021 4:45 PM

To: Griffio, Shannon <Griffio.Shannon@epa.gov>

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: RE: review

Dear all,

We have gone through **Ex. 6 Personal Privacy (PP)** comments, below is our findings:

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Regards,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)



Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffio, Shannon <Griffio.Shannon@epa.gov>

Sent: Tuesday, November 16, 2021 5:08 PM

To: Joseph Goffman; Ex. 6 Personal Privacy (PP)

Cc: Ex. 6 Personal Privacy (PP)

Subject: RE: review

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My recommendation is that Ex. 6 Personal Privacy (PP) reviews Ex. 6 Personal Privacy (PP) two lists, compares it to the information he used to enter the data, and then determine if anything on the current version of the report needs to be changed. It'd be great if we could compile a list of those things which I'd then relay to OGE. For the one Ex. 6 Personal Privacy (PP) doesn't manage, I'd just ask that someone take another close look at the statements and compare to the report (like Ex. 6 Personal Privacy (PP) did). And perhaps Ex. 6 Personal Privacy (PP) can do that with a fresh set of eyes.

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Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman; Ex. 6 Personal Privacy (PP)

Sent: Tuesday, November 16, 2021 3:18 PM

To: Ex. 6 Personal Privacy (PP)

Cc: Griffio, Shannon <Griffio.Shannon@epa.gov>; Ex. 6 Personal Privacy (PP)

Subject: Re: review

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Ex. 6 Personal Privacy (PP) Note that most of the missing items are those that Joe was asked to sell by OGE.

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Fingers crossed for you, Joe!

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 11/29/2021 5:58:35 PM
To: Griffio, Shannon [Griffio.Shannon@epa.gov]
Subject: Re: Federal Positions [Ex. 6 Personal Privacy (PP)]

Thanks. I'm going to send him a note now given the news about the WH.

On Mon, Nov 29, 2021 at 12:53 PM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Agreed. I'm hoping we can get OGE a response by tomorrow (at the latest). I heard White House also asked for an update this morning. So I'll actually ping [Ex. 6 Personal Privacy (PP)] by COB today if we haven't heard anything by then. Tell him we really need to respond by tomorrow.

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Monday, November 29, 2021 11:56 AM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Subject: Re: Federal Positions [Ex. 6 Personal Privacy (PP)]

Thanks for that. I stressed to [Ex. 6 Personal Privacy (PP)] how valuable it would be for us to get past this step today if possible, and indeed, I know you already agree that if we could get to the next round of engagement, whatever it turns out to be, with OGE as quickly as possible it would be great. Thanks, again.

On Mon, Nov 29, 2021 at 11:51 AM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Hi Joe,

I had a very nice Thanksgiving with family. Hope you did as well!

For the federal positions, we leave it as is since that's what it was as of 9/23. But I will mention that to OGE when we respond. And thanks for following up with [Ex. 6 Personal Privacy (PP)]. If I don't hear anything by tomorrow, I'll check in with him to see if he needs anything from me for his review.

Talk soon,
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Monday, November 29, 2021 8:51 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Federal Positions [Ex. 6 Personal Privacy (PP)]

Hi, Shannon.

Hope you had a nice Thanksgiving. Here's a potential correction on my 278: by the terms of the Vacancies Reform Act, I ceased being Acting Assistant Administrator in mid-November. Should the term of my tenure, as reported in the 278, be amended to reflect that, or do we leave it because January, 2021-Present was accurate as of September 23?

Also, I just spoke to [Ex. 6 Personal Privacy (PP)] and directed him to the email exchange at the end of the week before last and he swore he'd get on it -- reviewing the chart and performing the same QA/QC for [Ex. 6 Personal Privacy (PP)] [Ex. 6 Personal Privacy (PP)] did on the other holdings -- immediately. Feel free to check in with him if the spirit moves you.

Thanks.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/24/2022 7:12:54 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: [Ex. 6 Personal Privacy (PP)]
Subject: Re: Latest changes to Nominee Report

[Ex. 6 Personal Privacy (PP)] -- Just confirmed with Shannon that the only thing that needs scrutiny is the draft 278 now on the [integrity.gov](https://www.integrity.gov) site, and not the attachment. Thanks.

On Mon, Jan 24, 2022 at 1:49 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi [Ex. 6 Personal Privacy (PP)]

That is the old chart from two months ago and it hasn't been updated. It reflects the changes that needed to be made to accurately report everything as of date of signing – September 23, 2021. Those changes should now be reflected in the report, with the exception of adding Income Type to [Ex. 6 Personal Privacy (PP)] If something is identified as an EIF, then the Income Type field is not completed.

I didn't include anything about the sales in the chart since they occurred after the filing date. Instead (at OGE's request), in the report, I've inserted endnotes next to the assets that were sold subsequent to filing back in September.

Here are the line numbers of those sales/endnotes:

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)
Sent: Monday, January 24, 2022 1:14 PM
To: 'Joseph Goffman' Ex. 6 Personal Privacy (PP) Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: FW: Latest changes to Nominee Report

Hi Joe and Shannon,

This chart does not seem to reflect the recent sales - Shannon, I will double check the changes, can you send me the updated chart?

Thanks,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Monday, January 24, 2022 12:32 PM
To: Ex. 6 Personal Privacy (PP)
Subject: Latest changes to Nominee Report

Hi, [REDACTED] And the beat goes on. Does the attached, which Shannon put together, look OK to you? Would you also be willing to examine the asset entries in the latest version of the filing? If so, please go to integrity.gov. I think you are still listed as a designated user, but if not my login is [REDACTED]

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Thank you.

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/24/2022 10:25:04 PM
To: [Ex. 6 Personal Privacy (PP)]
CC: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: Latest changes to Nominee Report

Thank you, [Ex. 6 Personal Privacy (PP)] Now it's my turn now that you've done this most helpful task.

On Mon, Jan 24, 2022 at 4:37 PM [Ex. 6 Personal Privacy (PP)] wrote:

Hi Shannon,

I have reviewed the end notes for these sales and they are correct.

Note I did not review the entire Integrity report (as we did that in November), but reviewed the end notes as listed below and the report changes we identified in November.

Let me know if you have any questions.

All best,

[Ex. 6 Personal Privacy (PP)]

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Monday, January 24, 2022 1:50 PM

To: [Ex. 6 Personal Privacy (PP)] 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]

Subject: RE: Latest changes to Nominee Report

Hi [Ex. 6 Personal Privacy (PP)]

That is the old chart from two months ago and it hasn't been updated. It reflects the changes that needed to be made to accurately report everything as of date of signing – September 23, 2021. Those changes should now be reflected in the report, with the exception of adding Income Type to [Ex. 6 Personal Privacy (PP)] If something is identified as an EIF, then the Income Type field is not completed.

I didn't include anything about the sales in the chart since they occurred after the filing date. Instead (at OGE's request), in the report, I've inserted endnotes next to the assets that were sold subsequent to filing back in September.

Here are the line numbers of those sales/endnotes:

Ex. 6 Personal Privacy (PP)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: **Ex. 6 Personal Privacy (PP)**

Sent: Monday, January 24, 2022 1:14 PM

To: 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]; Griffio, Shannon <Griffio.Shannon@epa.gov>

Subject: FW: Latest changes to Nominee Report

Hi Joe and Shannon,

This chart does not seem to reflect the recent sales - Shannon, I will double check the changes, can you send me the updated chart?

Thanks,

[Ex. 6 Personal Privacy (PP)]

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]

Sent: Monday, January 24, 2022 12:32 PM

To: [Ex. 6 Personal Privacy (PP)]

Subject: Latest changes to Nominee Report

Hi, [Ex. 6 Personal Privacy (PP)] And the beat goes on. Does the attached, which Shannon put together, look OK to you? Would you also be willing to examine the asset entries in the latest version of the filing? If so, please go to integrity.gov. I think you are still listed as a designated user, but if not my login is [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

Thank you.

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/25/2022 3:54:56 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: Review of 278

Thanks, Shannon. Appreciate the answers to my questions. I've completed my review and I just left [Ex. 6 Personal Privacy (PP)] a voice mail directing him to your 8:30 email and asking him to respond ASAP.

On Tue, Jan 25, 2022 at 10:25 AM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

When I respond to OGE, I'll be sure to flag Part 1 (positions) - both that you are no longer Acting AA, and the addition of [Ex. 6 Personal Privacy (PP)]. See my responses to your questions below. If you've completed your review, I think the only thing we are waiting for is a response from [Ex. 6 Personal Privacy (PP)] about that one asset. Thanks!

JOE: Just want to confirm that the entries under "Previous Federal Positions" are appropriate. They were as of September 23, but on November 16, my Acting AA status terminated by operation of the Vacancy Reform Act.

SHANNON: They should be accurate as of 9/23 for purposes of this report, but I'll be sure to let OGE know these specific details.

JOE: In Part 2, I have been reading "do not include assets or income from United States federal government employment" to apply to my federal pension, but I can't find any record of your and my confirming this, although I thought that we had. So, I want to confirm with you that that reading is correct.

SHANNON: Correct. You do not need to report any income received as a government employee, and you do not need to report any retirement benefits you receive from the government, including TSP or any other US Government retirement system.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Monday, January 24, 2022 6:24 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Review of 278

Hi, Shannon.

I have reviewed the current draft of the 278 and spotted two items that I want to run by you:

Just want to confirm that the entries under "Previous Federal Positions" are appropriate. They were as of September 23, but on November 16, my Acting AA status terminated by operation of the Vacancy Reform Act.

In Part 2, I have been reading "do not include assets or income from United States federal government employment" to apply to my federal pension, but I can't find any record of your and my confirming this, although I thought that we had. So, I want to confirm with you that that reading is correct.

Thanks.

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/27/2022 10:06:18 PM
To: Griffio, Shannon [Griffio.Shannon@epa.gov]
Subject: Re: Timing Question

Thanks so much for the quick response. If I read correctly [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

Thanks, again.

On Thu, Jan 27, 2022 at 4:29 PM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

No bother at all! I wish I had an idea of OGE's timeline, but I honestly don't know. I was actually on a call with Justina when your email came in, so we talked through it. And she didn't have an answer either. One thing to note is that if [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

That being said, we can always look into [Ex. 5 Deliberative Process (DP)]

[Ex. 5 Deliberative Process (DP)]

[Ex. 5 Deliberative Process (DP)]

[Ex. 5 Deliberative Process (DP)] I agree it would make sense to try to have an idea of what OGE is thinking prior to that, but I'm not sure when that will happen. What I can do is reach out to OGE next week and say that [Ex. 5 Deliberative Process (DP)] and see if I can learn anything new about where they are in the process.

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Thursday, January 27, 2022 3:36 PM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Subject: Timing Question

Hi, Shannon. Sorry to bother you about this so soon after our last submission to OGE, but I just found out that there is a good chance that [Ex. 6 Personal Privacy (PP)] I am assuming that there is a real possibility, if not inevitability, [Ex. 5 Deliberative Process (DP)]

Ex. 5 Deliberative Process (DP)

Thanks.

Message

From: Goffman, Joseph [Goffman.Joseph@epa.gov]
Sent: 3/15/2022 1:39:55 AM
To: [REDACTED] Ex. 6 Personal Privacy (PP) Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: [REDACTED] Ex. 6 Personal Privacy (PP)
Subject: RE: Transactions Refresher

Thanks, [REDACTED] and thanks so much, Shannon, for responding to the request and maintaining a firm guiding hand.

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

From: [REDACTED] Ex. 6 Personal Privacy (PP)
Sent: Monday, March 14, 2022 3:39 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: [REDACTED] Ex. 6 Personal Privacy (PP)
Subject: RE: Transactions Refresher

Dear Joe and Shannon,
We confirm the trading procedure.

Best,

[REDACTED] Ex. 6 Personal Privacy (PP)

[REDACTED]
Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Monday, March 14, 2022 3:27 PM
To: Goffman, Joseph <Goffman.Joseph@epa.gov>
Cc: [REDACTED] Ex. 6 Personal Privacy (PP)
Subject: RE: Transactions Refresher

Hi Joe,

Yes, we generally have no issues with sales. But for purchases, just remember the language of your signed Ethics Agreement. Not sure if [REDACTED] Ex. 6 Personal Privacy (PP) are aware of it – but it states that for your managed accounts (or when you use the services of an investment professional), you will ensure that the account manager or investment professional obtains your prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the U.S.

So for purchases, we are generally good with EIFs, ETFs, or diversified mutual funds. But we'll need to take a real close look at purchases, and I'm happy to help Ex. 6 Personal Privacy (PP) Please don't hesitate to reach out with any questions, and feel free to keep checking in. We also want to make sure that you keep filing any 278-Ts within the appropriate timeframe.

Thanks for checking!

Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Goffman, Joseph <Goffman.Joseph@epa.gov>

Sent: Friday, March 11, 2022 3:00 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Cc: Ex. 6 Personal Privacy (PP)

Subject: Transactions Refresher

Hi, Shannon.

Hope you're doing well. This is probably a good juncture to refresh and confirm how we should operate going forward in terms of the family's investments and assets. First, I want to confirm that it is OK to make sales from the various

Ex. 6 Personal Privacy (PP)

Second, I want to confirm that you are OK with Ex. 6 Personal Privacy (PP) contacting you to find out whether specific purchases conform to my Ethics Agreement and with my conflicts-avoidance obligations overall.

Thanks for considering. Have a good weekend.

Best,
Joe

Joseph Goffman
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/6/2021 7:31:53 PM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Subject: Another Check-in from Ethics
Attachments: First Round OGE Questions - Goffman Responses 10_6_21.docx

Hi Joe,

Thanks for the voicemail yesterday. At this point, I thought the easiest thing to do would be to send you my updated chart which reflects where we currently stand. I can tell that Ex. 6 Personal Privacy (PP) was signed into INTEGRITY this morning working on your report so that's good news! I've noted the questions where we are still waiting for his input. But we are making progress!

The only thing I need from you right now is related to the non-federal retirement plans. I added your two Harvard ones, but needed to confirm the date your participation with these plans began – meaning your start date (month and year) at Harvard. Does October 2017 sound right?

And then finally, is Harvard the only missing one? Nothing from EDF?

You can also take a glance at the attached and let me know if you see any discrepancies with any of our previous discussions/correspondence.

Hopefully we will hear from Ex. 6 Personal Privacy (PP) soon that his review and edits are complete.

Thanks!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/6/2021 7:42:52 PM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Subject: RE: Another Check-in from Ethics
Attachments: First Round OGE Questions - Goffman Responses 10_6_21.docx

I changed the date to November in INTEGRITY and made a minor edit to the attached to reflect no other retirement plans.

I know you all are slammed over there! No rush. I'm really waiting to hear from Ex. 6 Personal Privacy (PP) so we can proceed with the "final" review. Good luck!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Sent: Wednesday, October 6, 2021 3:35 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Another Check-in from Ethics

Thanks, Shannon. Harvard start date was 11/1/17; end date was 1/19/20. The EDF plan was Ex. 6 Personal Privacy (PP) and is reflected in the account sheet Ex. 6 Personal Privacy (PP) sent last week. ;Hectic day here on OAR. More to you this evening. Thanks, again.

On Wed, Oct 6, 2021 at 3:31 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Thanks for the voicemail yesterday. At this point, I thought the easiest thing to do would be to send you my updated chart which reflects where we currently stand. I can tell that Ex. 6 Personal Privacy (PP) was signed into INTEGRITY this morning working on your report so that's good news! I've noted the questions where we are still waiting for his input. But we are making progress!

The only thing I need from you right now is related to the non-federal retirement plans. I added your two Harvard ones, but needed to confirm the date your participation with these plans began – meaning your start date (month and year) at Harvard. Does October 2017 sound right?

And then finally, is Harvard the only missing one? Nothing from EDF?

You can also take a glance at the attached and let me know if you see any discrepancies with any of our previous discussions/correspondence.

Hopefully we will hear from Ex. 6 Personal Privacy (PP) soon that his review and edits are complete.

Thanks!

Shannon

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/12/2021 3:27:09 PM
To: [REDACTED] Joseph Goffman [REDACTED]
Subject: RE: Quick Question -- Time Sensitive

Thanks all!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [REDACTED]
Sent: Tuesday, October 12, 2021 10:24 AM
To: Joseph Goffman [REDACTED] Griffo, Shannon <Griffo.Shannon@epa.gov> [REDACTED]
Subject: RE: Quick Question -- Time Sensitive

Joe,

The symbol is [REDACTED]

From: Joseph Goffman [REDACTED]
Sent: Tuesday, October 12, 2021 9:44 AM
To: [REDACTED]
Griffo, Shannon <Griffo.Shannon@epa.gov> [REDACTED]
Subject: Quick Question -- Time Sensitive

CAUTION: External email. Please exercise caution with links and attachments. Never enable any macros.

Hi, [REDACTED]

My colleague Shannon Griffo is handling a review of my financial disclosure material. Could you please answer her question below:

"for the [REDACTED] I went through statements and added the appropriate symbols to these funds. The only one I'm not 100% sure of is [REDACTED] Joe's New Entrant Report says [REDACTED] but could it be [REDACTED]? Would you happen to know the appropriate name/symbol for this one?"

[REDACTED] do happen to know?

Thanks.

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Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/18/2021 7:41:32 PM
To: Joseph Goffman **Ex. 6 Personal Privacy (PP)**
Subject: RE: Latest from OGC/Ethics

As always, thanks for the quick response!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**
Sent: Monday, October 18, 2021 2:30 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Latest from OGC/Ethics

- "The filer pre-approves every purchase" CONFIRMED
- "OGE said you're going to need to confirm with your account manager(s) or investment professional(s) that they will obtain your prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States." CONFIRMED

On Mon, Oct 18, 2021 at 2:17 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Hope you had a nice weekend! I've sent Justina my "conflicts analysis" that OGE requested. Once I get her comments, I'll send it over to OGE. I've also made all the necessary technical changes to your report that OGE requested. For now we've listed both positions (Acting AA and Principal Deputy AA) with the same dates, January 2021 through present.

Now one other thing that OGE requested I raise with you is related to your use of managed accounts. OGE has "found that a filer's lack of control over a managed account makes it difficult for the filer to avoid potential conflicts of interests. Receiving notification of assets in a managed account is not sufficient. However, there are ways to prevent a managed account from acquiring potentially conflicting assets:

- The filer pre-approves every purchase; or
- The filer has the fund manager agree to limit purchases to cash, cash equivalents, and/or diversified mutual funds as defined in 5 CFR 2640.
- If the filer cannot prevent the managed account from acquiring potentially conflicting assets, the filer may need to exit the account altogether."

OGE said you're going to need to confirm with your account manager(s) or investment professional(s) that they will obtain your prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States. And note that this standard language *will appear in your ethics agreement*.

I know we had said to do a freeze for now, but I also wanted to ensure you were aware of this requirement and that you are good with what OGE is requesting. Again, this is their standard language. Please confirm that this is acceptable and we'll keep moving right along!

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/16/2021 10:08:16 PM
To: Joseph Goffman; **Ex. 6 Personal Privacy (PP)**
CC: **Ex. 6 Personal Privacy (PP)**
Subject: RE: review

My recommendation is that **Ex. 6 Personal Privacy (PP)** reviews **Ex. 6 Personal Privacy (PP)** two lists, compares it to the information he used to enter the data, and then determine if anything on the current version of the report needs to be changed. It'd be great if we could compile a list of those things which I'd then relay to OGE. For the one **Ex. 6 Personal Privacy (PP)** doesn't manage, I'd just ask that someone take another close look at the statements and compare to the report (like **Ex. 6 Personal Privacy (PP)** did). And perhaps **Ex. 6 Personal Privacy (PP)** can do that with a fresh set of eyes.

And as far as missing items which were divested pursuant to the CDs, I previously told **Ex. 6 Personal Privacy (PP)** that they would not need to be reported since Joe no longer holds them and technically no "income" was received during the reporting period. His 278-Ts will suffice for those purposes.

Thanks all!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman <**Ex. 6 Personal Privacy (PP)**>
Sent: Tuesday, November 16, 2021 3:18 PM
To: **Ex. 6 Personal Privacy (PP)**
Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>; **Ex. 6 Personal Privacy (PP)**
Subject: Re: review

Thanks so very much for all of the diligence on this, **Ex. 6 Personal Privacy (PP)** Shannon -- is there any follow up you need for me -- or any thing specific that **Ex. 6 Personal Privacy (PP)** needs to focus on, particularly with regard to reporting on **Ex. 6 Personal Privacy (PP)** does not manage? Thanks

On Tue, Nov 16, 2021 at 10:13 AM **Ex. 6 Personal Privacy (PP)** wrote:

Good morning Joe and Shannon,

Following are the remaining discrepancies in the remaining 3 accounts that we manage (We can not verify the **Ex. 6 Personal Privacy (PP)** Note that most of the missing items are those that Joe was asked to sell by OGE. **Ex. 6 Personal Privacy (PP)**

Feel free to call if you have any questions.

Fingers crossed for you, Joe!

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

The contents of this e-mail and any attachments are confidential and for use solely by the intended recipients. If you are not the intended recipient, please notify us immediately by e-mail, and delete the original message. Delivery of this e-mail to any person other than an intended recipient does not waive privilege or confidentiality in any way. This information is for informational purposes only and is not an offer to buy, sell or recommend securities. Ex. 6 Personal Privacy (PP) claims compliance with the Global Investment Performance Standards (GIPS®). A compliant presentation is available at Ex. 6 Personal Privacy (PP) Past performance is not indicative of future results.

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/18/2021 5:18:02 PM
To: Joseph Goffman
Subject: RE: Follow-up needed from EPA

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

After talking with [REDACTED] I made an edit to the chart below regarding the [REDACTED] She clarified that the symbol just needed to be changed. See below for the updated version. Thanks!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Griffo, Shannon
Sent: Thursday, November 18, 2021 10:53 AM

To: Joseph Goffman

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: Follow-up needed from EPA

Hi all,

I've started a chart to reflect what changes need to be made to the report based on the emails received so far from [REDACTED] and their recent reviews. I've noted in the "Comments" the ones I have questions on or need further review/confirmation. These were the ones where there might have been disagreement, and then [REDACTED] sent a follow-up email yesterday at 5:10pm with additional information. But please double check the other proposed changes to make sure I'm not missing something. Also, a few comments:

- [REDACTED] have you gone through [REDACTED] email regarding Joe's [REDACTED] See her email from Monday 11/15 at 5:45pm. Those items are at the top of this chart.
- [REDACTED] isn't listed below. But if something needs to be changed on any of those assets, please let me know.

Thanks so much!!

Line #	Parent Asset	Asset	Current Report	Proposed Change	Comments
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Ex. 6 Personal Privacy (PP); Ex. 6 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 6 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 6 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/18/2021 7:20:53 PM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Subject: RE: Follow-up needed from EPA

Understood! I was in the process of drafting an update for OGE, so I'll be sure to add that we are also dealing with folks out given the upcoming holiday.

And just so you know – I'm out tomorrow. Will be working some Monday, but then out the rest of the week. I say "out" but I'll be checking email by phone and accessible should Ex. 6 Personal Privacy (PP) become available to review etc.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Sent: Thursday, November 18, 2021 1:59 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Follow-up needed from EPA

Thanks, Shannon. I would prefer to wait until Ex. 6 Personal Privacy (PP) is available to perform this function for the Ex. 6 Personal Privacy (PP) even at the cost of delay. I suspect that the bank would not be any faster than waiting for Ex. 6 Personal Privacy (PP) to return, in fact, and Ex. 6 Personal Privacy (PP) certainly knows his way around the report and this material. Do you think it would make sense, if you haven't done so already, to let OGE know where we are in the process lest we lose whatever momentum we have with them (or am I saying back to you something you've already suggested in an earlier email?). Anyway, thank you for your heroic diligence on all of this.

On Thu, Nov 18, 2021 at 12:12 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Ex. 6 Personal Privacy (PP) and I spoke and she clarified the Ex. 6 Personal Privacy (PP) I made a change to that one below. It's just the ticker symbol that needed to be edited – no asset is missing. I'll reply all and make that change to the chart.

So now all we need is Ex. 6 Personal Privacy (PP) to give us the final confirmation on the things listed below. And we need to decide what to do about the Ex. 6 Personal Privacy (PP) review. Ex. 6 Personal Privacy (PP) mentioned maybe asking Ex. 6 Personal Privacy (PP) to take a close look at it? Or perhaps Ex. 6 Personal Privacy (PP) can just go through it with a fine tooth comb like Ex. 6 Personal Privacy (PP) did? I forwarded you his out of office email so I'm not sure whether we will get a response before the holiday.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Griffo, Shannon
Sent: Thursday, November 18, 2021 10:53 AM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: Follow-up needed from EPA

Hi all,

I've started a chart to reflect what changes need to be made to the report based on the emails received so far from Ex. 6 Personal Privacy (PP) and their recent reviews. I've noted in the "Comments" the ones I have questions on or need further review/confirmation. These were the ones where there might have been disagreement, and then [redacted] sent a follow-up email yesterday at 5:10pm with additional information. But please double check the other proposed changes to make sure I'm not missing something. Also, a few comments:

- [redacted] have you gone through [redacted] email regarding Joe's Ex. 6 Personal Privacy (PP) See her email from Monday 11/15 at 5:45pm. Those items are at the top of this chart.
- [redacted] isn't listed below. But if something needs to be changed on any of those assets, please let me know.

Thanks so much!!

Line #	Parent Asset	Asset	Current Report	Proposed Change	Comments
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Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/29/2021 10:29:54 PM
To: [REDACTED]; Joseph Goffman [REDACTED]
Subject: RE: Thanks from EPA Ethics! (and latest chart)

Thanks [REDACTED] I updated the chart below to reflect those comments. If there's anything else, just let me know.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [REDACTED]
Sent: Monday, November 29, 2021 4:52 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Joseph Goffman [REDACTED]
Subject: RE: Thanks from EPA Ethics! (and latest chart)

Hi Shannon

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Best,

[REDACTED]

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Monday, November 29, 2021 4:28 PM
To: Joseph Goffman [REDACTED]
Subject: Thanks from EPA Ethics! (and latest chart)

Hi all,

Based on [REDACTED] review of our emails and a closer look at the [REDACTED] information, below is the chart that we will be sending forward to OGE. This reflects the changes we believe need to be made to Joe's report signed on 9/23/21. If anyone notices anything else, just let me know. But our plan is to get this to OGE ASAP.

Joe, I'll follow-up in a separate email about our OGE response so you can look at it once more.

Thanks again for all your help!
Shannon

Line #	Parent Asset	Asset	Current Report	Proposed Change
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Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 1/24/2022 7:04:16 PM
To: Joseph Goffman; [Ex. 6 Personal Privacy (PP)]
Subject: RE: Report ready for your review

Sorry for missing your call. I just tried you. Give me a ring back at your convenience.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman; [Ex. 6 Personal Privacy (PP)]
Sent: Monday, January 24, 2022 1:58 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Report ready for your review

Hi, Shannon. Please call me. I'm beyond confused about this attachment and your note to [Ex. 6 Personal Privacy (PP)] about it in a separate email chain [Ex. 6 Personal Privacy (PP)]. Thanks.

On Mon, Jan 24, 2022 at 11:23 AM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Your report is now ready for your review. [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)] And per OGE's request, I added endnotes to the assets which were sold subsequent to filing. Please personally review all entries in the current version of your financial disclosure report and affirm that they are correct. If you see something that's not right, please let me know.

Thanks!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 1/25/2022 10:32:58 PM
To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Subject: RE: Quick Question from EPA Ethics

I'll keep you posted on when I hear back from OGE. And thanks for your assistance in the quick turnaround!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, January 25, 2022 5:03 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: [Ex. 6 Personal Privacy (PP)]
Subject: Re: Quick Question from EPA Ethics

Thank you, both.

On Tue, Jan 25, 2022 at 4:59 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

[Ex. 6 Personal Privacy (PP)] - Thanks for confirming!

Joe - I'll reach out to OGE now saying your review is complete.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, January 25, 2022 4:51 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]
Subject: RE: Quick Question from EPA Ethics

Hi Shannon,

Based on the report screenshotted below, it is correctly listed under

[Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

#89 is Correct -

[Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

I believe the original listing as [redacted] was incorrect.

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, January 25, 2022 8:31 AM

To: [redacted] **Ex. 6 Personal Privacy (PP)**

Cc: 'Joseph Goffman' [redacted] **Ex. 6 Personal Privacy (PP)**

Subject: Quick Question from EPA Ethics

WARNING: This e-mail originated from outside of [redacted] **Ex. 6 Personal Privacy (PP)** Always use caution when opening attachments or clicking links.

H [redacted] **Ex. 6 Personal Privacy (PP)**

Hope you are doing well! I have what is hopefully an easy question for you. Two months ago we had you and [redacted] double check everything in Joe Goffman's report to ensure it was accurate as of 9/23/21 (date of filing). We've since been asked to make those changes to Joe's report. In doing so, [redacted] mentioned that we should have you check one asset because it's from [redacted] **Ex. 6 Personal Privacy (PP)**

[redacted] **Ex. 6 Personal Privacy (PP)** as of 9/23/21? Below is the current entry. At one point the income amount was [redacted] **Ex. 6 Personal Privacy (PP)** Can you confirm what the

appropriate category is for this one? We also had it originally listed as Ex. 6 Personal Privacy (PP) which I thought we determined was the incorrect symbol given the fund name.

Thanks so much for your help!

Shannon

Ex. 6 Personal Privacy (PP)

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

Disclaimer: Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, Ex. 6 Personal Privacy (PP) would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

Message

From: Payne, James (Jim) [payne.james@epa.gov]
Sent: 8/20/2021 8:51:00 PM
To: Hoffer, Melissa [Hoffer.Melissa@epa.gov]
Subject: Re: PPT Goffman Complaint

Or again tonight.

Sent from my iPhone

On Aug 20, 2021, at 4:49 PM, Payne, James (Jim) <payne.james@epa.gov> wrote:

I've missed. If haven't otherwise connected, I can call tomorrow am.

Sent from my iPhone

On Aug 20, 2021, at 4:37 PM, Payne, James (Jim) <payne.james@epa.gov> wrote:

Calling in a moment

Sent from my iPhone

On Aug 20, 2021, at 4:12 PM, Hoffer, Melissa <Hoffer.Melissa@epa.gov> wrote:

Thanks, Jim. Can you please give me a call.

From: Payne, James (Jim) <payne.james@epa.gov>
Sent: Friday, August 20, 2021 3:45 PM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>
Subject: Re: PPT Goffman Complaint

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Sent from my iPhone

On Aug 18, 2021, at 6:36 PM, Payne, James (Jim) <payne.james@epa.gov> wrote:

More information, FYI.

From: O'Donnell, Sean <ODonnell.Sean@epa.gov>
Sent: Wednesday, August 18, 2021 9:00 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: May, Benjamin <May.Benjamin@epa.gov>
Subject: Re: PPT Goffman Complaint

Thanks, Justina, this is helpful. I sent this to our Hotline for processing.

On Aug 17, 2021, at 11:54 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

Ex. 5 Deliberative Process (DP)

- On 8/4/21, OGC Ethics provided an interim FOIA response to Ms. Morgan Yardis of Protect the Public's Trust (EPA-2021-004097). She had requested various ethics-related records produced by or received by the Office of General Counsel, Ethics Office (OGC/Ethics) and EPA's Designated Agency Ethics Official pertaining or relating to twelve identified political appointees, including Mr. Goffman. That's how she received the referenced documents.
- Please note that we do not assert attorney-client privilege. As set forth at 5 C.F.R. § 2635.107, "[d]isclosures made by an employee to an agency ethics official are not protected by an attorney-client privilege." We may, though, assert deliberative process privilege and privacy rights.
- With respect to Mr. Goffman, I communicated with the White House Counsel's Office, and they concurred in my approach to redress the apparent oops. That email was not included in our interim response on 8/4/21 because we had not yet received clearance from them. We have since received clearance, however, and will include that email exchange in our next interim release.
- Just so you know, Executive Order 13989 does allow for pledge waivers, and those determinations have been delegated by the Office of Management and Budget to the Agency DAEs.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,

Morgan Yardis

<Goffman IG complaint 1.pdf>

From: Hoffer, Melissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B497C7C804FB41E3BC952E3007F27870-HOFFER, MEL]
Sent: 8/18/2021 11:46:33 PM
To: Payne, James (Jim) [payne.james@epa.gov]
CC: Packard, Elise [Packard.Elise@epa.gov]
Subject: RE: PPT Goffman Complaint

Ex. 5 Deliberative Process (DP)

From: Payne, James (Jim) <payne.james@epa.gov>
Sent: Wednesday, August 18, 2021 6:37 PM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>
Subject: FW: PPT Goffman Complaint

More information, FYI.

From: O'Donnell, Sean <ODonnell.Sean@epa.gov>
Sent: Wednesday, August 18, 2021 9:00 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: May, Benjamin <May.Benjamin@epa.gov>
Subject: Re: PPT Goffman Complaint

Thanks, Justina, this is helpful. I sent this to our Hotline for processing.

On Aug 17, 2021, at 11:54 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

Ex. 5 Deliberative Process (DP)

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Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,

Morgan Yardis

<Goffman IG complaint 1.pdf>

From: Hoffer, Melissa [Hoffer.Melissa@epa.gov]
Sent: 8/18/2021 11:46:33 PM
To: Payne, James (Jim) [payne.james@epa.gov]
CC: Packard, Elise [Packard.Elise@epa.gov]
Subject: RE: PPT Goffman Complaint

Ex. 5 Deliberative Process (DP)

From: Payne, James (Jim) <payne.james@epa.gov>
Sent: Wednesday, August 18, 2021 6:37 PM
To: Hoffer, Melissa <Hoffer.Melissa@epa.gov>
Cc: Packard, Elise <Packard.Elise@epa.gov>
Subject: FW: PPT Goffman Complaint

More information, FYI.

From: O'Donnell, Sean <ODonnell.Sean@epa.gov>
Sent: Wednesday, August 18, 2021 9:00 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
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Ex. 5 Deliberative Process (DP)

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Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Let me know if you want to confer about this at all, and whether you think either or both of us need to respond.

Cheers,
Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone
202-564-1786 | fax 202-564-1772

From: Morgan Yardis <morgan@protectpublictrust.org>

Sent: Tuesday, August 17, 2021 9:38 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; O'Donnell, Sean <ODonnell.Sean@epa.gov>

Subject: PPT Goffman Complaint

Good morning,

Please find the attached request regarding "Request for Investigation into Ethics Violation by Acting Associate Administrator Joseph Goffman."

Thank you,
Morgan Yardis
<Goffman IG complaint 1.pdf>

Message

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**
Sent: 11/11/2021 12:29:07 AM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]; Fugh, Justina [Fugh.Justina@epa.gov]
Subject: "Discretionary Trust"

Found this definition:

A discretionary trust is **a trust that contains a provision giving the trustee discretion to pay to the beneficiary only so much of the income and principal of the trust property as the trustee sees fit.**

Ex. 6 Personal Privacy (PP)

Please let me know how you think I should proceed to respond OGE's question.

Thanks.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 11/29/2021 6:01:58 PM
To: [Ex. 6 Personal Privacy (PP)] Griffio, Shannon [Griffio.Shannon@epa.gov]
Subject: Not a moment too soon...

Was our call this AM. I just heard from a source that the White House put out a ping on this. So, the sooner we can land this the better. Please feel free to contact Shannon in real time if you have any questions. Thanks as always for the help, [Ex. 6 Personal Privacy (PP)]

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 1/18/2022 4:38:14 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP)
Subject: Ex. 6 Personal Privacy (PP)

Dear Shannon,

Thank you again for taking the time to speak with me.

As we discussed, there is: Ex. 6 Personal Privacy (PP)

1. Ex. 6 Personal Privacy (PP)

2. Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

In addition, we will contact you with sale transactions for approval before executing trades.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 12/14/2021 7:00:40 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: December Check-In

Hi, Shannon. Hope you're doing well and looking forward to a good holiday. I'm wondering what might happen next with OGE and if you have any sense of when we might hear anything back from them.

Thanks.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 12/6/2021 9:58:32 PM
To: Griffio, Shannon [Griffo.Shannon@epa.gov];
Subject: Re: [Ex. 6 Personal Privacy (PP)] Shannon Call

Ex. 6 Personal Privacy (PP)

Thanks for the help on this, Shannon.

On Mon, Dec 6, 2021 at 9:23 AM Joseph Goffman [Ex. 6 Personal Privacy (PP)] wrote:
Hi, Shannon

Just wanted to let you know that [Ex. 6 Personal Privacy (PP)] would like to call you to raise a question about a possible transaction. Thanks.

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 1/24/2022 3:59:43 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: 'Joseph Goffman' Ex. 6 Personal Privacy (PP)
Subject: RE: Ex. 6 Personal Privacy (PP) Goffman sales

Hi Shannon,

The Ex. 6 Personal Privacy (PP) entire position. Joe's Ex. 6 Personal Privacy (PP) still owns it. Ex. 6 Personal Privacy (PP)
Hope this helps!

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Monday, January 24, 2022 10:55 AM
To: Ex. 6 Personal Privacy (PP)
Cc: 'Joseph Goffman' Ex. 6 Personal Privacy (PP)
Subject: RE: Ex. 6 Personal Privacy (PP) Goffman sales

Me again. I think this will be my last question about the sales. Hopefully!

Ex. 6 Personal Privacy (PP) that was sold in December – was that from Ex. 6 Personal Privacy (PP) And was it all sold or is there anything remaining in the account? I just want to make sure I identify the right one on the report.

I really appreciate all your help!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)
Sent: Monday, January 24, 2022 9:35 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: 'Joseph Goffman' Ex. 6 Personal Privacy (PP)
Subject: RE: Ex. 6 Personal Privacy (PP) Goffman sales

Hi Shannon,

Yes, the Ex. 6 Personal Privacy (PP) were sold for the accounts we manage.
All best,

Ex. 6 Personal Privacy (PP)

From: Griffio, Shannon <Griffio.Shannon@epa.gov>

Sent: Monday, January 24, 2022 9:19 AM

To: Ex. 6 Personal Privacy (PP)

Cc: 'Joseph Goffman' Ex. 6 Personal Privacy (PP)

Subject: RE: Ex. 6 Personal Privacy (PP) Goffman sales

Thanks! Were those positions in Ex. 6 Personal Privacy (PP) also all sold then? Or do any shares remain in those accounts? If they were all sold, I may go ahead and note that as well.

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)

Sent: Monday, January 24, 2022 8:55 AM

To: Griffio, Shannon <Griffio.Shannon@epa.gov>

Cc: 'Joseph Goffman' Ex. 6 Personal Privacy (PP)

Subject: RE: Ex. 6 Personal Privacy (PP) Goffman sales

Hi Shannon,

We sold the Ex. 6 Personal Privacy (PP)

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffio, Shannon <Griffio.Shannon@epa.gov>

Sent: Sunday, January 23, 2022 7:22 PM

To: **Ex. 6 Personal Privacy (PP)**

Cc: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)**

Subject: RE: **Ex. 6 Personal Privacy (PP)** Goffman sales

Thanks **Ex. 6 Personal Privacy (PP)**

One follow-up question. With these sales, I'm trying to figure out the approximate value left **Ex. 6 Personal Privacy (PP)** Would you be able to give me an estimate or range? Even if it's just how many shares are left. I know for **Ex. 6 Personal Privacy (PP)** there's still **Ex. 6 Personal Privacy (PP)** so I don't need anything else for that one.

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: **Ex. 6 Personal Privacy (PP)**

Sent: Friday, January 21, 2022 6:36 PM

To: Griffio, Shannon <Griffio.Shannon@epa.gov>

Cc: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)**

Subject: RE: **Ex. 6 Personal Privacy (PP)** Goffman sales

Hi Shannon,

Yes, all the positions listed below **except** **Ex. 6 Personal Privacy (PP)**

Have a good weekend,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffio, Shannon <Griffio.Shannon@epa.gov>

Sent: Friday, January 21, 2022 6:26 PM

To: **Ex. 6 Personal Privacy (PP)**

Cc: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)**

Subject: RE: **Ex. 6 Personal Privacy (PP)** Goffman sales

Hi **Ex. 6 Personal Privacy (PP)**

We've been asked to identify any of Joe's assets that were recently sold. I know **Ex. 6 Personal Privacy (PP)** was sold back in December. But were any of the assets below sold yet?

Thanks and have a great weekend!
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency
(202) 564-7061

From: Griffo, Shannon

Sent: Tuesday, January 18, 2022 9:36 PM

To: [REDACTED] **Ex. 6 Personal Privacy (PP)**

Subject: RE: [REDACTED] / Goffman sales

Hi [REDACTED]

We have no concerns with the sales you've proposed below. I'd just note that for any sale that exceeds \$1,000, Joe will need to complete a periodic transaction report (278-T) within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs.

Thanks!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**

Sent: Tuesday, January 18, 2022 5:36 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: [REDACTED] / Goffman sales

Dear Shannon,
As discussed, we recommend selling as follows in the Goffman/[REDACTED] accounts:

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please let me know if we may proceed.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/25/2022 1:24:01 PM
To: [Ex. 6 Personal Privacy (PP)] Griffio, Shannon [Griffio.Shannon@epa.gov]
Subject: Quick Question coming in from Shannon

[Ex. 6 Personal Privacy (PP)] -- Please expect to hear from Shannon with a quick question about an item in the 278. It would be great if we could wrap this question up quickly so that we can get to the next round of this process. Thanks, as always, for the help.

Best,
Joe

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 11/29/2021 8:56:17 PM
To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]; Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: RE: Not a moment too soon...

Hi Shannon,

Regarding your email on 11/18, I am ok with [Ex. 6 Personal Privacy (PP)] changes, and below are a few answers to questions you posted:

Ex. 6 Personal Privacy (PP)

Also, I went through the [Ex. 6 Personal Privacy (PP)] information that we have again and did not come up with any additional changes needed.

Please let me know if there is anything I missed or that you need.

Regards,

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: Monday, November 29, 2021 1:02 PM
To: [Ex. 6 Personal Privacy (PP)] Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Not a moment too soon...

WARNING: This e-mail originated from outside of [Ex. 6 Personal Privacy (PP)] Always use caution when opening attachments or clicking links.

Was our call this AM. I just heard from a source that the White House put out a ping on this. So, the sooner we can land this the better. Please feel free to contact Shannon in real time if you have any questions. Thanks as always for the help,

[Ex. 6 Personal Privacy (PP)]

Disclaimer: Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, **Ex. 6 Personal Privacy (PP)** would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 1/25/2022 1:21:51 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: [Ex. 6 Personal Privacy (PP)]
Subject: Re: Latest changes to Nominee Report

Shannon -- I think that it would be better practice for you to connect with [Ex. 6 Personal Privacy (PP)] directly even on this simple question lest something get lost in translation between him and me and/or you and me relaying his answer; plus, he should still be fluent with the material. I will alert him that you will be contacting him. Thanks.

On Tue, Jan 25, 2022 at 8:13 AM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

My comments are in red below. Joe, note that we need to ask [Ex. 6 Personal Privacy (PP)] about one asset. Thanks [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)] correct? If so, fine. Correct. That was the missing asset that was added to his [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)] (I think you noted this could not be added to the report) Correct. Can't add Income Type (dividends) to EIFs. It won't let you do that in INTEGRITY.

[Ex. 6 Personal Privacy (PP)] can you double check this as I think it should be [Ex. 6 Personal Privacy (PP)] That was the other missing asset. Good catch. I went ahead and deleted [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)] should verify. Joe, are you good if I reach out to [Ex. 6 Personal Privacy (PP)] to ask him to confirm the following? Are you can if you prefer. We just need someone to say whether is accurate as of 9/23/21:

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]
Sent: Monday, January 24, 2022 4:23 PM
To: 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Latest changes to Nominee Report

Hi Shannon,

I have checked these chart entries vs. the Integrity site and note the following:

[Ex. 6 Personal Privacy (PP)] correct? If so, fine.

[Ex. 6 Personal Privacy (PP)] (I think you noted this could not be added to the report)

Ex. 6 Personal Privacy (PP)

should be

Ex. 6 Personal Privacy (PP)

can you double check this as I think it

Ex. 6 Personal Privacy (PP)

should verify.

I will work on the sales next.

Best,

Ex. 6 Personal Privacy (PP)

From: **Ex. 6 Personal Privacy (PP)**

Sent: Monday, January 24, 2022 1:14 PM

To: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)** Griffio, Shannon' <Griffio.Shannon@epa.gov>

Subject: FW: Latest changes to Nominee Report

Hi Joe and Shannon,

This chart does not seem to reflect the recent sales - Shannon, I will double check the changes, can you send me the updated chart?

Thanks,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Monday, January 24, 2022 12:32 PM

To: Pamela L. W. Raviol **Ex. 6 Personal Privacy (PP)**

Subject: Latest changes to Nominee Report

Hi, **Ex. 6 Personal Privacy (PP)** And the beat goes on. Does the attached, which Shannon put together, look OK to you? Would you also be willing to examine the asset entries in the latest version of the filing? If so, please go to integrity.gov. I think you are still listed as a designated user, but if not my login is **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

Thank you.

Message

From: [REDACTED] Ex. 6 Personal Privacy (PP)
Sent: 1/24/2022 6:14:24 PM
To: 'Joseph Goffman' [REDACTED] Ex. 6 Personal Privacy (PP) Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: FW: Latest changes to Nominee Report
Attachments: Joseph Goffman Nominee Report Changes 1 24 22.docx

Hi Joe and Shannon,

This chart does not seem to reflect the recent sales - Shannon, I will double check the changes, can you send me the updated chart?

Thanks,

[REDACTED]

[REDACTED]
Ex. 6 Personal Privacy (PP)

From: Joseph Goffman [REDACTED] Ex. 6 Personal Privacy (PP)
Sent: Monday, January 24, 2022 12:32 PM
To: [REDACTED] Ex. 6 Personal Privacy (PP)
Subject: Latest changes to Nominee Report

Hi, [REDACTED] And the beat goes on. Does the attached, which Shannon put together, look OK to you? Would you also be willing to examine the asset entries in the latest version of the filing? If so, please go to integrity.gov. I think you are still listed as a designated user, but if not my login is [REDACTED] Ex. 6 Personal Privacy (PP)

[REDACTED] Ex. 6 Personal Privacy (PP)

Thank you.

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Message

From: Ex. 6 Personal Privacy (PP)
Sent: 2/2/2022 10:14:48 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Subject: Sales

Dear Shannon,

We propose selling Ex. 6 Personal Privacy (PP) Joe's portfolios and Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please let me know if we can proceed.

Thank you,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Ex. 6 Personal Privacy (PP)
Sent: 1/31/2022 1:57:04 AM
To: Ex. 6 Personal Privacy (PP)
CC: Ex. 6 Personal Privacy (PP) Griffo, Shannon [Griffo.Shannon@epa.gov]; Joseph Goffman
Subject: Re: FW: CD question

Dear Ex. 6 Personal Privacy (PP)

I'm writing to confirm that Ex. 6 Personal Privacy (PP) may send confirmations for my Ex. 6 Personal Privacy (PP)

Sorry for the delay and thanks!

Best, Ex. 6 Personal Privacy (PP)

On Thu, Jan 27, 2022 at 2:02 PM Ex. 6 Personal Privacy (PP) wrote:

Dear Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) please confirm that you will prepare the 278-T after receipt of confirmations.

Ex. 6 Personal Privacy (PP) please confirm we should have Ex. 6 Personal Privacy (PP) send confirmations for your Ex. 6 Personal Privacy (PP) We have approval for Joe's account and his Ex. 6 Personal Privacy (PP)

Thanks,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Wednesday, January 26, 2022 5:53 PM
To: Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP) Griffo, Shannon
<Griffo.Shannon@epa.gov>
Subject: Re: FW: CD question

Fine here. Thanks.

On Wed, Jan 26, 2022 at 5:16 PM **Ex. 6 Personal Privacy (PP)** wrote:

Dear **Ex. 6 Personal Privacy (PP)**,

Please let me know if you agree on the proposal below for sending trade confirmations to **Ex. 6 Personal Privacy (PP)** for filing the 278T after trades are executed.

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Monday, January 24, 2022 3:10 PM

To: **Ex. 6 Personal Privacy (PP)**

Cc: **Ex. 6 Personal Privacy (PP)** Griffio, Shannon
<Griffio.Shannon@epa.gov>

Subject: Re: FW: CD question

It is certainly satisfactory to me, given the demands on my time, etc, provided that **Ex. 6 Personal Privacy (PP)** is comfortable taking on this assignment. I believe that **Ex. 6 Personal Privacy (PP)** took care of these filings when I was in the Obama administration? Thanks.

On Mon, Jan 24, 2022 at 2:57 PM **Ex. 6 Personal Privacy (PP)** wrote:

Dear **Ex. 6 Personal Privacy (PP)** Joe, and **Ex. 6 Personal Privacy (PP)**

I just spoke with Shannon Griffio about the time requirements for filing the 278-T. Since there is a 30 day window from the transaction date to file the report, it is probably best to file as the trades occur. To this end, since we are sending Shannon emails with trade proposals for approval, we will copy **Ex. 6 Personal Privacy (PP)** so he is aware of the pending trade. **Ex. 6 Personal Privacy (PP)** we can have **Ex. 6 Personal Privacy (PP)** send you copies of the trade confirmations, if you and Joe and **Ex. 6 Personal Privacy (PP)** approve, so you can cross reference the approval with the trades.

Please let me know if this is satisfactory.

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)

Sent: Monday, January 24, 2022 11:28 AM

To: Ex. 6 Personal Privacy (PP) Joseph Goffman Ex. 6 Personal Privacy (PP)

Cc: Ex. 6 Personal Privacy (PP)

Subject: RE: FW: CD question

Hi Ex. 6 Personal Privacy (PP)

I think it is best to wait to file once per month, provided it is done timely. The risk, as I see it, of filing as trades are done is that some are missed and there is not a comprehensive review of what was done in the past motnh.

Up to you and Joe –

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)

Sent: Friday, January 21, 2022 10:13 AM

To: Joseph Goffman Ex. 6 Personal Privacy (PP)

Cc: Ex. 6 Personal Privacy (PP)

Subject: RE: FW: CD question

Ex. 6 Personal Privacy (PP)

Perhaps best to wait until January statement is available and we can file then? Please let me know what you think.

Thanks!

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Thursday, January 20, 2022 8:39 PM
To: Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP)
Subject: Re: FW: CD question

WARNING: This e-mail originated from outside of Ex. 6 Personal Privacy (PP). Always use caution when opening attachments or clicking links.

Ex. 6 Personal Privacy (PP) please let me know if you are willing to take care of filling in the 278-T to report these sales and if so whether you have enough information from Ex. 6 Personal Privacy (PP) and/or need information from me. Thanks.

On Wed, Jan 19, 2022 at 5:36 PM Ex. 6 Personal Privacy (PP) wrote:

Hi Ex. 6 Personal Privacy (PP)

We made sales (below) today **Ex. 6 Personal Privacy (PP)** Goffman accounts. Please confirm you will file the 278-T form for Joe for these; the details should be on the monthly statements. We did not sell the **Ex. 6 Personal Privacy (PP)** this was one of the diversified instruments subject to the certificate of divestiture; the question is does this asset assume the tax lot (date) from the asset sold pursuant to the CD, which makes it a long term vs short term holding?

Many thanks,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffio, Shannon <Griffio.Shannon@epa.gov>

Sent: Wednesday, January 19, 2022 3:19 PM

To: **Ex. 6 Personal Privacy (PP)**

Cc: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)**

Subject: RE: CD question

Hi **Ex. 6 Personal Privacy (PP)**

I actually don't know the answer to your question. So I asked around and got the same response – that this is more of a tax question, and we don't provide tax advice. We can only refer you to 26 U.S.C. § 1043 and 5 C.F.R. part 2634, subpart J. Sorry!

Thanks,

Shannon

Shannon Griffio

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: **Ex. 6 Personal Privacy (PP)**

Sent: Wednesday, January 19, 2022 1:52 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)**
Subject: CD question

Hi Shannon,

The **Ex. 6 Personal Privacy (PP)** is one of the ETFs that we bought as a result of the CD. While we know the cost basis is reduced by the gain from the CD, does the asset **Ex. 6 Personal Privacy (PP)** in this case) take on the same tax lot date as the original holding? This makes a difference in long/term vs short term sales.

Thank you,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, January 18, 2022 9:36 PM

To: **Ex. 6 Personal Privacy (PP)**

Subject: RE: **Ex. 6 Personal Privacy (PP)** Goffman sales

Hi **Ex. 6 Personal Privacy (PP)**

We have no concerns with the sales you've proposed below. I'd just note that for any sale that exceeds \$1,000, Joe will need to complete a periodic transaction report (278-T) within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs.

Thanks!

Shannon

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Ex. 6 Personal Privacy (PP)

Sent: Tuesday, January 18, 2022 5:36 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: Ex. 6 Personal Privacy (PP) Goffman sales

Dear Shannon,

As discussed, we recommend selling as follows in the Goffman Ex. 6 Personal Privacy (PP) accounts:

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please let me know if we may proceed.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Ex. 6 Personal Privacy (PP)
Sent: 2/3/2022 3:00:40 PM
To: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP); Griffio, Shannon [Griffio.Shannon@epa.gov]
CC: Ex. 6 Personal Privacy (PP)
Subject: RE: Sales

Hi Joe

Ex. 6 Personal Privacy (PP) will be sending the confirmations directly to Ex. 6 Personal Privacy (PP)

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Sent: Thursday, February 3, 2022 9:53 AM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Cc: Ex. 6 Personal Privacy (PP)
Subject: Re: Sales

Ex. 6 Personal Privacy (PP) and Shannon -- Thank you for handling this Ex. 6 Personal Privacy (PP) -- I assume you will send Ex. 6 Personal Privacy (PP) the confirmations of this sale and of the sales in your earlier email for purposes of filing the 278 T reporting the sales. Thanks.

On Thu, Feb 3, 2022 at 7:44 AM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Hi Ex. 6 Personal Privacy (PP)

No issues with these sales Ex. 6 Personal Privacy (PP)

Thanks!

Shannon

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)

Sent: Wednesday, February 2, 2022 5:15 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Cc: Joseph Goffman; Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: Sales

Dear Shannon,

We propose selling Ex. 6 Personal Privacy (PP) Joe's portfolios and Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please let me know if we can proceed.

Thank you,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Ex. 6 Personal Privacy (PP)
Sent: 10/11/2021 3:08:14 PM
To: 'Joseph Goffman' Ex. 6 Personal Privacy (PP) Griffio, Shannon [Griffio.Shannon@epa.gov]
Subject: RE: Report is ready for your Review

Good morning, Joe,

As far as I know:

1. Ex. 6 Personal Privacy (PP)
 2. Ex. 6 Personal Privacy (PP) question for Shannon) . Not sure if you have Ex. 6 Personal Privacy (PP)
 3. Ex. 6 Personal Privacy (PP)
- Ex. 6 Personal Privacy (PP)

Please let me know if you have any questions.

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Sunday, October 10, 2021 10:17 PM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>; Ex. 6 Personal Privacy (PP)
Subject: Re: Report is ready for your Review

Hi, Shannon. I've gone over everything. Now that Ex. 6 Personal Privacy (PP) has done revisions and also reports that he's checked everything, I've spot checked the Parts of the 278 that require the listing of individual assets, etc I actually think Ex. 6 Personal Privacy (PP) superior fluency with the material and his long experience as our accountant makes his review more reliable than mine. I think we do need him to confirm the answer(s) to the questions in the second box on the first page. I can confirm everything else in the the 278 and the six-pager, except for this:

have any of the following:

Ex. 6 Personal Privacy (PP)

At the moment Ex. 6 Personal Privacy (PP) Should we report that? In that vein I am copying Ex. 6 Personal Privacy (PP) to ask her to answer the question as to whether Ex. 6 Personal Privacy (PP) constitute the kind of accounts that have to be reported here as well.

Thanks.

On Sat, Oct 9, 2021 at 11:01 AM Joseph Goffman <Ex. 6 Personal Privacy (PP)> wrote:

H, Shannon. Thank you so very much for taking the time on a Saturday morning to review this. I will add my own review to this weekend's to-do list and try to get this done today or tomorrow and report back to you.

On Sat, Oct 9, 2021 at 10:46 AM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Hi Joe,

Hope you're having a nice (and somewhat relaxing) weekend! Ex. 6 Personal Privacy (PP) has finished his edits in your Nominee Report and I spent some time this morning going through everything. I only had two minor follow-up questions for him. One dealt with the correct fund name/symbol for a holding Ex. 6 Personal Privacy (PP)
Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Otherwise, I think it's ready for your review! I updated our chart to send OGE and the only thing left was the second box on the first page. I think Ex. 6 Personal Privacy (PP) has adequately addressed that, but wanted to make sure you've had a chance to go through everything as well.

Let me know if you have any additional edits or comments. And once you give it the green light, I'll send over our responses to OGE.

Thanks,
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 2/2/2022 4:21:03 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP)
Subject: RE: proposed sales - Ex. 6 Personal Privacy (PP)

Thank you, Shannon.
We will execute the sales today.
All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Wednesday, February 2, 2022 11:07 AM
To: Ex. 6 Personal Privacy (PP)
Cc: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP)
Subject: RE: proposed sales - Ex. 6 Personal Privacy (PP)

Hi Ex. 6 Personal Privacy (PP)

We have no concerns with the sales you've proposed below.

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)
Sent: Wednesday, February 2, 2022 9:32 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP)
Subject: FW: proposed sales - Ex. 6 Personal Privacy (PP)

Hi Shannon,

We propose the sales below from **Ex. 6 Personal Privacy (PP)** Please let me know if we can proceed.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Tuesday, February 1, 2022 6:23 PM

To: **Ex. 6 Personal Privacy (PP)**

Cc: **Ex. 6 Personal Privacy (PP)**

Subject: Re: proposed sales

We approve. Thank you for taking care of sending to Shannon.

On Tue, Feb 1, 2022 at 4:21 PM **Ex. 6 Personal Privacy (PP)** wrote:

Dear **Ex. 6 Personal Privacy (PP)** and Joe,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Please let me know if you approve and I will forward to Shannon Griffo for OGE approval.

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

The contents of this e-mail and any attachments are confidential and for use solely by the intended recipients. If you are not the intended recipient, please notify us immediately by e-mail, and delete the original message. Delivery of this e-mail to any person other than an intended recipient does not waive privilege or confidentiality in any way. This information is for informational purposes only and is not an offer to buy, sell or recommend securities. Ex. 6 Personal Privacy (PP) claims compliance with the Global Investment Performance Standards (GIPS®). A compliant presentation is available at Ex. 6 Personal Privacy (PP) Past performance is not indicative of future results.

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Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 10/12/2021 1:41:37 PM
To: [Ex. 6 Personal Privacy (PP)]
CC: Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: Re: Report is ready for your Review
Attachments: ATT00001.txt

I will ask via a separate email. Hang on.

On Tue, Oct 12, 2021 at 9:37 AM [Ex. 6 Personal Privacy (PP)] wrote:

Hi Shannon,

[Ex. 6 Personal Privacy (PP)] so best to ask him.

(I think it may be [Ex. 6 Personal Privacy (PP)]

All best,

[Ex. 6 Personal Privacy (PP)]

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, October 12, 2021 9:29 AM

To: [Ex. 6 Personal Privacy (PP)] 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)]

Subject: RE: Report is ready for your Review

Maybe [Ex. 6 Personal Privacy (PP)] could answer this question – for the [Ex. 6 Personal Privacy (PP)] I went through statements and added the appropriate symbols to these funds. The only one I'm not 100% sure of is [Ex. 6 Personal Privacy (PP)] Joe's New Entrant Report says [Ex. 6 Personal Privacy (PP)] Would you happen to know the appropriate name/symbol for this one?

Thanks!

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, October 12, 2021 9:22 AM
To: 'Joseph Goffman' Ex. 6 Personal Privacy (PP) Griffio, Shannon <Griffio.Shannon@epa.gov>
Subject: RE: Report is ready for your Review

Dear Joe and Shannon,

Yes, the Ex. 6 Personal Privacy (PP)

All the Ex. 6 Personal Privacy (PP) we manage (5 in total) should be listed in the report.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Monday, October 11, 2021 7:26 PM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Cc: Ex. 6 Personal Privacy (PP)
Subject: Re: Report is ready for your Review

Sorry. I think I was just having brain lock last night. My questions really didn't make sense. I think everything is there. Just to be on the safe side, please put Ex. 6 Personal Privacy (PP) Otherwise, all good, pending hearing from Ex. 6 Personal Privacy (PP) on the one remaining question about the second item on page 1. Thanks

On Mon, Oct 11, 2021 at 7:17 PM Griffio, Shannon <Griffio.Shannon@epa.gov> wrote:

Hi Joe and Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) do I just need to change the amount category? Remember we can aggregate all accounts at one banking institution.

You also have **Ex. 6 Personal Privacy (PP)** I'm guessing that's what is referring to below?

And as far as **Ex. 6 Personal Privacy (PP)** I'm a little confused by what you are referencing. The ones lists below, are they all already in the report?

Thanks!

Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: **Ex. 6 Personal Privacy (PP)**
Sent: Monday, October 11, 2021 11:08 AM
To: 'Joseph Goffman' **Ex. 6 Personal Privacy (PP)** Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Report is ready for your Review

Good morning, Joe,

As far as I know:

1. **Ex. 6 Personal Privacy (PP)**
1. **Ex. 6 Personal Privacy (PP)** - question for Shannon) . Not sure if you have **Ex. 6 Personal Privacy (PP)**
2. **Ex. 6 Personal Privacy (PP)**
Ex. 6 Personal Privacy (PP)

Please let me know if you have any questions.

All best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Sunday, October 10, 2021 10:17 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Ex. 6 Personal Privacy (PP)

Subject: Re: Report is ready for your Review

Hi, Shannon. I've gone over everything. Now that **Ex. 6 Personal Privacy (PP)** has done revisions and also reports that he's checked everything, I've spot checked the Parts of the 278 that require the listing of individual assets, etc. I actually think **Ex. 6 Personal Privacy (PP)** superior fluency with the material and his long experience as our accountant makes his review more reliable than mine. I think we do need him to confirm the answer(s) to the questions in the second box on the first page. I can confirm everything else in the the 278 and the six-pager, except for this:

have any of the following:

Ex. 6 Personal Privacy (PP)

At the moment **Ex. 6 Personal Privacy (PP)** Should we report that? In that vein I am copying **Ex. 6 Personal Privacy (PP)** to ask her to answer the question as to whether **Ex. 6 Personal Privacy (PP)** constitute the kind of accounts that have to be reported here as well.

Thanks.

On Sat, Oct 9, 2021 at 11:01 AM Joseph Goffman <**Ex. 6 Personal Privacy (PP)**> wrote:

H, Shannon. Thank you so very much for taking the time on a Saturday morning to review this. I will add my own review to this weekend's to-do list and try to get this done today or tomorrow and report back to you.

On Sat, Oct 9, 2021 at 10:46 AM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Joe,

Hope you're having a nice (and somewhat relaxing) weekend! **Ex. 6 Personal Privacy (PP)** has finished his edits in your Nominee Report and I spent some time this morning going through everything. I only had two minor follow-up questions for him. One dealt with the correct fund name/symbol for a holding **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Otherwise, I think it's ready for your review! I updated our chart to send OGE and the only thing left was the second box on the first page. I think **Ex. 6 Personal Privacy (PP)** has adequately addressed that, but wanted to make sure you've had a chance to go through everything as well.

Let me know if you have any additional edits or comments. And once you give it the green light, I'll send over our responses to OGE.

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

■

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 10/12/2021 1:44:23 PM
To: [Ex. 6 Personal Privacy (PP)]
Griffo, Shannon [Griffo, Shannon@epa.gov]; [Ex. 6 Personal Privacy (PP)]
Subject: Quick Question -- Time Sensitive

Hi [Ex. 6 Personal Privacy (PP)]

My colleague Shannon Griffo is handling a review of my financial disclosure material. Could you please answer her question below:

"for the [Ex. 6 Personal Privacy (PP)] I went through statements and added the appropriate symbols to these funds. The only one I'm not 100% sure of is [Ex. 6 Personal Privacy (PP)] Joe's New Entrant Report says [Ex. 6 Personal Privacy (PP)] but could it be [Ex. 6 Personal Privacy (PP)] Would you happen to know the appropriate name/symbol for this one?"

[Ex. 6 Personal Privacy (PP)] -- do happen to know?

Thanks.

Message

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Sent: 10/12/2021 5:07:05 PM
To: Griffo, Shannon [Griffo.Shannon@epa.gov]
CC: [Ex. 6 Personal Privacy (PP)]
Subject: Re: One more question - Joe's report

Thank you, and echoing Shannon, thank you [Ex. 6 Personal Privacy (PP)] for all the help on this and for not fainting and running away when you read "we'll await the second round of questions."

On Tue, Oct 12, 2021 at 1:05 PM Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Perfect. Both have been removed and I also [Ex. 6 Personal Privacy (PP)]

With that, I believe the second box on page 1 is now complete and the reporting periods are all confirmed.

Joe, I'm going to go ahead and send the attached chart to OGE. Then we'll await the second round of questions.

Thanks again everyone!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, October 12, 2021 12:01 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Subject: RE: One more question - Joe's report

Hi Shannon,

Both can be removed [Ex. 6 Personal Privacy (PP)]

Regards,

[Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, October 12, 2021 11:48 AM

To: Joseph Goffman {

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: One more question - Joe's report

WARNING: This e-mail originated from outside of { Ex. 6 Personal Privacy (PP) } Always use caution when opening attachments or clicking links.

Hi all,

I just wanted to say thanks again for all the help with Joe's report! There's only one outstanding question I had regarding Joe's { Ex. 6 Personal Privacy (PP) }

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 5 Deliberative Process (DP)

I had asked { Ex. 5 Personal Privacy (PP) } but I know he's got another upcoming deadline this week. So any feedback would be greatly appreciated. Then I'll be able to hit send on our responses to OGE!

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

Disclaimer: Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal

opinion, nor is it sufficient to avoid tax-related penalties. If desired **Ex. 6 Personal Privacy (PP)** would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 10/12/2021 1:22:17 PM
To: 'Joseph Goffman' Ex. 6 Personal Privacy (PP); Griffo, Shannon [Griffo.Shannon@epa.gov]
Subject: RE: Report is ready for your Review

Dear Joe and Shannon,

Yes, the Ex. 6 Personal Privacy (PP)

All the Ex. 6 Personal Privacy (PP) we manage (5 in total) should be listed in the report.

Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman Ex. 6 Personal Privacy (PP)
Sent: Monday, October 11, 2021 7:26 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: Ex. 6 Personal Privacy (PP)
Subject: Re: Report is ready for your Review

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Thanks!

Shannon

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]

Sent: Monday, October 11, 2021 11:08 AM

To: 'Joseph Goffman' [Ex. 6 Personal Privacy (PP)] Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: RE: Report is ready for your Review

Good morning, Joe,

As far as I know:

1. [Ex. 6 Personal Privacy (PP)]

1. [Ex. 6 Personal Privacy (PP)] question for Shannon) . Not sure if you have [Ex. 6 Personal Privacy (PP)]

2. [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

Please let me know if you have any questions.

All best,

[Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

From: Joseph Goffman [Ex. 6 Personal Privacy (PP)]

Sent: Sunday, October 10, 2021 10:17 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

[Ex. 6 Personal Privacy (PP)]

Subject: Re: Report is ready for your Review

Hi, Shannon. I've gone over everything. Now that **Ex. 6 Personal Privacy (PP)** has done revisions and also reports that he's checked everything, I've spot checked the Parts of the 278 that require the listing of individual assets, etc. I actually think **Ex. 6 Personal Privacy (PP)**'s superior fluency with the material and his long experience as our accountant makes his review more reliable than mine. I think we do need him to confirm the answer(s) to the questions in the second box on the first page. I can confirm everything else in the the 278 and the six-pager, except for this:

have any of the following:

Ex. 6 Personal Privacy (PP)

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Ex. 6 Personal Privacy (PP) Otherwise, I think it's ready for your review! I updated our chart to send OGE and the only thing left was the second box on the first page. I think **Ex. 6 Personal Privacy (PP)** has adequately addressed that, but wanted to make sure you've had a chance to go through everything as well.

Let me know if you have any additional edits or comments. And once you give it the green light, I'll send over our responses to OGE.

Thanks,
Shannon

Shannon Griffio
Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/18/2021 3:55:40 PM
To: Joseph Goffman [Ex. 6 Personal Privacy (PP)]
Subject: FW: Follow-up needed from EPA

FYI – Not sure when we'll be able to get a response from him on that last email I sent.

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]
Sent: Thursday, November 18, 2021 10:53 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Automatic reply: Follow-up needed from EPA

Thank you for your email. I am currently out of the office and will return on November 29th. I will have access to emails but my responses may be delayed.

If you should require immediate assistance, please contact our office at [Ex. 6 Personal Privacy (PP)] and you will be directed to someone that can assist you.

Regards,

[Ex. 6 Personal Privacy (PP)]

Disclaimer: Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, [Ex. 6 Personal Privacy (PP)] would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/18/2021 3:53:07 PM
To: Joseph Goffman; Ex. 6 Personal Privacy (PP)
Subject: Ex. 6 Personal Privacy (PP)
Follow-up needed from EPA

Hi all,

I've started a chart to reflect what changes need to be made to the report based on the emails received so far from Ex. 6 Personal Privacy (PP) and their recent reviews. I've noted in the "Comments" the ones I have questions on or need further review/confirmation. These were the ones where there might have been disagreement, and then Ex. 6 Personal Privacy (PP) sent a follow-up email yesterday at 5:10pm with additional information. But please double check the other proposed changes to make sure I'm not missing something. Also, a few comments:

- Ex. 6 Personal Privacy (PP), have you gone through Ex. 6 Personal Privacy (PP) email regarding Joe's Ex. 6 Personal Privacy (PP)? See her email from Monday 11/15 at 5:45pm. Those items are at the top of this chart.
- Ex. 6 Personal Privacy (PP) isn't listed below. But if something needs to be changed on any of those assets, please let me know.

Thanks so much!!

Line #	Parent Asset	Asset	Current Report	Proposed Change	Comments
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Ex. 6 Personal Privacy (PP); Ex. 6 (EIGA)

Ex. 6 Personal Privacy (PP); Ex. 6 (EIGA)

Ex. 6 Personal Privacy; Ex. 3 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/29/2021 9:28:13 PM
To: Joseph Goffman **Ex. 6 Personal Privacy (PP)**
Subject: **Ex. 6 Personal Privacy (PP)**
Thanks from EPA Ethics! (and latest chart)

Hi all,

Based on **Ex. 6 Personal Privacy (PP)** review of our emails and a closer look at the **Ex. 6 Personal Privacy (PP)** information, below is the chart that we will be sending forward to OGE. This reflects the changes we believe need to be made to Joe's report signed on 9/23/21. If anyone notices anything else, just let me know. But our plan is to get this to OGE ASAP.

Joe, I'll follow-up in a separate email about our OGE response so you can look at it once more.

Thanks again for all your help!
Shannon

Line #	Parent Asset	Asset	Current Report	Proposed Change
Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)				

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 11/16/2021 4:30:01 PM
To: [REDACTED] Joseph Goffman [REDACTED]
Subject: RE: Quick connection

Hi [REDACTED]

Correct. For an IRA, we only need to report the underlying assets that individually were worth more than \$1,000 at the end of the reporting period. OGE does not treat tax-deferred income accruing within a retirement account as having been received because of the limitations on withdrawal and other regulatory requirements governing such accounts. However, we would need to report any distributions as having been received. [REDACTED]

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Also for any stocks that were divested pursuant to a certificate of divestiture – I had told [REDACTED] that those could be deleted from the report since Joe no longer holds them and technically no “income” was received during the reporting period. His 278-Ts will suffice.

Thanks again!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [REDACTED]
Sent: Tuesday, November 16, 2021 7:39 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Joseph Goffman [REDACTED]
Subject: Re: Quick connection

Hi Shannon,
Can you confirm we are not to include sales in the IRA that incurred a gain?
Thanks,

[REDACTED]

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

On Nov 15, 2021, at 6:08 PM, Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Thanks

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) - before moving to the next stage in the process, Joe has been asked to review the report carefully once more (given that he will be personally responsible for all entries in the report as they currently appear) and confirm everything is accurate. At this time we are not making any changes to the report in INTEGRITY. If something is incorrect, don't change it. Instead, just let me know and I'll keep a running list to share with OGE. So can you please double check Ex. 6 Personal Privacy (PP) list below and let me know if any changes would need to be made to Joe's report?

Much appreciated!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)

Sent: Monday, November 15, 2021 5:45 PM

To: 'Joseph Goffman' Ex. 6 Personal Privacy (PP); Griffo, Shannon <Griffo.Shannon@epa.gov>; Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: RE: Quick connection

Dear All,

As I discussed with Shannon, this is the first time I have really dug into the report, so I would Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Nevertheless, below are the Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

More to come tomorrow on

remaining accts.

Ex. 6 Personal Privacy (PP); Ex. 3 (EIGA)

Have a good evening,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

From: Joseph Goffman **Ex. 6 Personal Privacy (PP)**

Sent: Monday, November 15, 2021 2:03 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov> **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

Subject: Quick connection

Hi, Shannon. I am hoping that you and **Ex. 6 Personal Privacy (PP)** can connect quickly about a question that **Ex. 6 Personal Privacy (PP)** who manages most of our holdings, has. I have asked **Ex. 6 Personal Privacy (PP)** to second my own personal review of the 278 and OGE's confirmatory request and she has spotted something that needs attention.

Many thanks to you both.

Best,
Joe

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 1/19/2022 8:18:52 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
CC: 'Joseph Goffman' [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: RE: CD question

Hi [REDACTED] **Ex. 6 Personal Privacy (PP)**

I actually don't know the answer to your question. So I asked around and got the same response – that this is more of a tax question, and we don't provide tax advice. We can only refer you to 26 U.S.C. § 1043 and 5 C.F.R. part 2634, subpart J. Sorry!

Thanks,
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Sent: Wednesday, January 19, 2022 1:52 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Cc: 'Joseph Goffman' [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: CD question

Hi Shannon,

The [REDACTED] is one of the ETFs that we bought as a result of the CD. While we know the cost basis is reduced by the gain from the CD, does the asset ([REDACTED] in this case) take on the same tax lot date as the original holding? This makes a difference in long/term vs short term sales.

Thank you,

[REDACTED] **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Tuesday, January 18, 2022 9:36 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: RE: [REDACTED] **Ex. 6 Personal Privacy (PP)** Goffman sales

H: Ex. 6 Personal Privacy (PP)

We have no concerns with the sales you've proposed below. I'd just note that for any sale that exceeds \$1,000, Joe will need to complete a periodic transaction report (278-T) within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs.

Thanks!
Shannon

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, January 18, 2022 5:36 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Ex. 6 Personal Privacy (PP) Goffman sales

Dear Shannon,
As discussed, we recommend selling as follows in the Goffman, Ex. 6 Personal Privacy (PP) accounts:

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Please let me know if we may proceed.
Best,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

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Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 1/25/2022 1:31:28 PM
To: Ex. 6 Personal Privacy (PP)
CC: 'Joseph Goffman'; Ex. 6 Personal Privacy (PP)
Subject: Quick Question from EPA Ethics

H: Ex. 6 Personal Privacy (PP)

Hope you are doing well! I have what is hopefully an easy question for you. Two months ago we had you and [REDACTED] double check everything in Joe Goffman's report to ensure it was accurate as of 9/23/21 (date of filing). We've since been asked to make those changes to Joe's report. In doing so, [REDACTED] mentioned that we should have you check one asset because it's from Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) as of 9/23/21? Below is the current entry. At one point the income amount was Ex. 6 Personal Privacy (PP). Can you confirm what the appropriate category is for this one? We also had it originally listed as Ex. 6 Personal Privacy (PP) which I thought we determined was the incorrect symbol given the fund name.

Thanks so much for your help!
Shannon

Ex. 6 Personal Privacy (PP)

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/12/2021 3:47:44 PM
To: Joseph Goffman; **Ex. 6 Personal Privacy (PP)**
Subject: **Ex. 6 Personal Privacy (PP)**
One more question - Joe's report

Hi all,

I just wanted to say thanks again for all the help with Joe's report! There's only one outstanding question I had regarding Joe's **Ex. 6 Personal Privacy (PP)**

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) I had asked **Ex. 6 Personal Privacy (PP)** but I know he's got another upcoming deadline this week. So any feedback would be greatly appreciated. Then I'll be able to hit send on our responses to OGE!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

Message

From: Griffo, Shannon [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C901EB2C3BA4556A4A581B8816D5A9A-VALLANCE, SHANNON]
Sent: 10/12/2021 5:05:13 PM
To: [Ex. 6 Personal Privacy (PP)] Joseph Goffman [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)]
Subject: RE: One more question - Joe's report
Attachments: First Round OGE Questions - Joseph Goffman Responses.docx

Perfect. Both have been removed and I also [Ex. 6 Personal Privacy (PP)]

With that, I believe the second box on page 1 is now complete and the reporting periods are all confirmed.

Joe, I'm going to go ahead and send the attached chart to OGE. Then we'll await the second round of questions.

Thanks again everyone!

Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, October 12, 2021 12:01 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>; Joseph Goffman [Ex. 6 Personal Privacy (PP)]
[Ex. 6 Personal Privacy (PP)]
Subject: RE: One more question - Joe's report

Hi Shannon,

Both can be removed [Ex. 6 Personal Privacy (PP)]

Regards,

Ex. 6 Personal Privacy (PP)

> Sign up for our newsletter

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Tuesday, October 12, 2021 11:48 AM

To: Joseph Goffman

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: One more question - Joe's report

WARNING: This e-mail originated from outside of Ex. 6 Personal Privacy (PP) Always use caution when opening attachments or clicking links.

Hi all,

I just wanted to say thanks again for all the help with Joe's report! There's only one outstanding question I had regarding Joe's

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) I had asked Ex. 6 Personal Privacy (PP) but I know he's got another upcoming deadline this week. So any feedback would be greatly appreciated. Then I'll be able to hit send on our responses to OGE!

Shannon Griffo
Office of General Counsel, Ethics Office
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(202) 564-7061

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